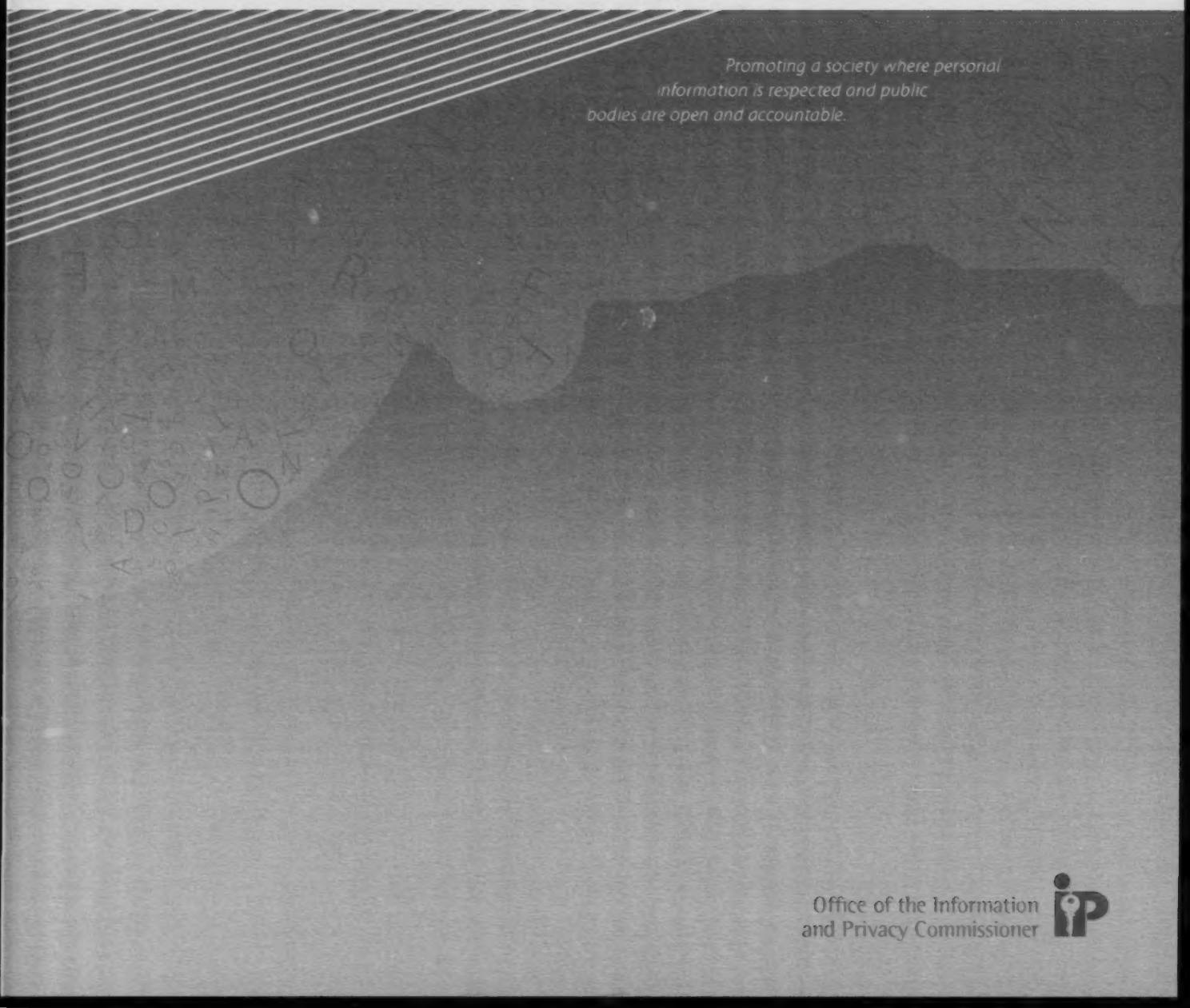
2010-11 Office of the Information and Privacy Commissioner of Alberta Annual Report

Promoting a society where personal information is respected and public bodies are open and accountable.



Office of the Information and Privacy Commissioner

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CONTENTS

2 **Message from the Commissioner**

7 **Organizational Structure 2010-11**

8 **The Process: Request For Review/Complaint**

9 **Office of the Information and Privacy Commissioner**

- **9** 2010-11 Overview
- **9** Breakdown of Cases Opened in 2010-11 by Legislation
- **9** Breakdown of Cases Closed in 2010-11 by Legislation
- **9** Breakdown on Non-case Related Calls, Emails and Written Enquiries
- **10** Financial Overview

11 **The *Freedom of Information and Protection of Privacy Act (FOIP Act)***

- **11** Review of the *FOIP Act*
- **12** Statistics
- **12** Consultations and Presentations
- **12** Open Government/Data
- **12** Requests to the Commissioner's Office

13 ***Health Information Act (HIA)***

- **13** *Health Information Amendment Act* (Bill 52)
- **13** New Custodians designated in 2010-11
- **14** Outreach
- **14** Privacy Impact Assessments
- **14** New PIA Requirements
- **14** Investigation Report H2010-IR-002

15 ***Personal Information Protection Act (PIPA)***

17 **Breach Notification Decisions**

19 **Case Summaries**

20 **Other Activities**

22 **Orders**

27 **Judicial Reviews And Other Court Decisions**

32 **Statistical Information**

- **32 Table 1:** Cases Opened 2010-11 Fiscal Year *FOIP, HIA,* and *PIPA*
- **33 Table 2:** Cases Closed 2010-11 Fiscal Year *FOIP, HIA,* and *PIPA*
- **34 Graph 1:** Total Number of Cases Opened – A Two Year Comparison
- **35 Graph 2:** Total Number of Cases Closed – A Two Year Comparison
- **36 Table 3:** Cases Opened by Public Bodies, Custodians, Organizations Subject to the Legislation, and Commissioner on Own Motion
- **37 Table 4:** Percentage of Cases Closed by Resolution Method
- **38 Graph 3:** Percentage of Cases Closed by Resolution Method
- **38 Graph 4:** *FOIP, HIA,* and *PIPA* Non-case Related Calls, Emails, and Written Enquiries

39 **Financial Statements**

53 **Appendices**

- **53** Appendix A: Cases Opened 2010-11 Fiscal Year by Public Body, Custodian and Organization Type
- **56** Appendix B: Cases Closed 2010-11 Fiscal Year by Public Body, Custodian and Organization Type
- **59** Appendix C: Orders and Public Investigation Reports Issued
- **61** Appendix D: Accepted Privacy Impact Assessments by Public Body and Custodian Type: 2010-11

MESSAGE FROM THE COMMISSIONER

This will be my last Annual Report as Commissioner. My term ends in December of this year. I wanted to use this space to talk about some of the accomplishments of the Office of the Information and Privacy Commissioner.

In 1995, Bob Clark asked me to come and work for him in establishing the Office of the Information and Privacy Commissioner of Alberta. We hired great people; we built an Office. We did a lot of work for Alberta. I became Commissioner in 2001. Since then, the Office of the Information and Privacy Commissioner has opened almost 10,000 (9,913) files, reviewed 3,142 privacy impact assessments and issued 428 Orders.

This has been the toughest, most rewarding job I have ever had. I have been so fortunate to be able to do something so interesting, so utterly relevant and, at the same time, to serve the people of Alberta. I am going to refer to the Office of the Information and Privacy Commissioner as either "OIPC" or "we", out of deep gratitude to the people I have worked with in this Office.

We started out with just the *Freedom of Information and Protection of Privacy Act (FOIP Act)*. It was supposed to make information accessible from public bodies, the provincial government, municipalities, universities, schools, hospitals and police, among others. It was supposed to regulate how public bodies collected, used and disclosed our personal information. It worked very well in the sense that public bodies became quite efficient at obeying the law. As with any law, over time, there was a certain amount of fencing over what specific words in the *FOIP Act* meant. We would issue Orders; some got judicially reviewed, and the Order would stand or fall.

The end result of the statutory process for us is the issuance of an Order. The OIPC's first Order, Order 96-001, held that the Department of Justice was required by section 11 of the *Maintenance Enforcement Act* and section 5 of the *FOIP Act* to refuse an individual access to a file in their custody. It was six pages long. Other Orders held that the collection of personal information using keystroke logging is not authorized under the *FOIP Act* (F2005-003); a nursing home must disclose complaints about the home (F2005-009); the City of Edmonton, Edmonton Police Service and pawnshops are not authorized under the *FOIP Act* or the *Personal Information Protection Act (PIPA)* to collect personal information of customers and put it in a database outside Alberta (F2007-001, F2007-002, P2007-001, quashed on judicial review); information about the use of Government credit cards must be disclosed under the *FOIP Act* (F2008-014, F2008-015); disclosure of health services provider information by pharmacies and pharmacists to IMS contravenes the *Health Information Act (HIA)* (H2002-003, quashed on judicial review); video surveillance in a men's change room for the purposes of driving thieves away does not contravene *PIPA* (P2006-008); drivers' license scanning by bars contravenes *PIPA* (P2006-011). We issued 303 orders under the *FOIP Act*, 45 under the *HIA* and 80 under *PIPA* since 2000.

While holding an inquiry and issuing an Order is the conclusion of our statutory process, it is not just an Order that brings about change. Alberta Justice and Attorney General accepted the findings and recommendations set out in Investigation Report F2010-IR-001 which found that the ministry contravened the *FOIP Act* when it conducted credit checks on 25 employees. My Office reviewed the privacy impact assessment submitted by the University of Alberta in relation to its plans to outsource its email services to Google. The University considered our comments and recommendations in its negotiations with Google which lead to a contract that is "the first of its kind in Canada" and is expected to be adopted by other Canadian universities "now that Alberta has paved the way" (Edmonton Journal, December 8, 2010). Public bodies often approach my Office for comments as to their access and privacy obligations under the *FOIP Act* in relation to proposed programs and initiatives.

Part of the statutory mandate of the OIPC is to educate and inform about the *FOIP Act*. We did this through the media, through a number of publications and hundreds of presentations to the public and stakeholder groups. There was created, in most public bodies, a cadre of access professionals whose job it was to administer the *FOIP Act*. They were our counterparts, our allies to some extent. We wanted a relationship with them because they advised the decision-makers as to what information went out. To this end, the OIPC put on a conference

in 1998 at the Shaw Conference Centre. The hope was that this would bring people together to educate and inform about the legislation. In 2003, we handed this over to the University of Alberta, and they turned it into the outstanding *FOIP Conference* that they put on in Edmonton each June.

One of the reasons the University of Alberta took it over was that, in 2000, the OIPC and the Ministry of Labour, which was then responsible for the *FOIP Act*, put up matching funds to seed an access and privacy program at the University of Alberta. This became the Information Access and Protection of Privacy Program. With support from the Access to Information Commissioner of Canada it became a bilingual national program. It is now an international program with 322 graduates from all over Canada and the world. Albertans should be very proud of this accomplishment. My hope is that the University of Alberta will one day become a centre of academic excellence in access and privacy.

In 1999, Bill 40, the *Health Information Act*, was passed by the Legislative Assembly. It came into force in 2000. This law was very controversial because, for health care purposes, it allowed the collection, use and disclosure of personal health information without consent. The OIPC supported the Bill because it was believed that it was necessary in order to facilitate the development of an effective electronic health record network. I became Assistant Commissioner with responsibility for the *HIA*. An *HIA* team was created within the OIPC. One of the most powerful features of the *HIA* was the provision requiring privacy impact assessments as electronic health records are created. This has resulted in the *HIA* team reviewing hundreds of privacy impact assessments every year. Albertans' health information is that much more secure and properly used as a result of this oversight. Since 2002 we have opened 4369 files under the *HIA*. Of these, 3,142 were for privacy impact assessments (PIAs).

The most significant PIA during that time is the Alberta Netcare Portal PIA (H1124), which Alberta Health and Wellness submitted on behalf of all Netcare participants in 2006. This PIA assessed the privacy risks of making core health information of all Albertans available through an Internet portal. Netcare was Canada's first provincial electronic health record system and includes lab test results, diagnostic images and prescription data. This PIA and the measures to protect health information described within have set the standard for most large-scale health information systems in Alberta.

There have been occasions when significant changes were brought about not by Orders but by an investigation following a complaint. Investigation Report H2005-IR-002 reviewed a complaint that the Alberta Cancer Board had shared women's information without consent as part of a cancer screening program. While consent is not required for this kind of sharing, custodians do have a duty under the *HIA* to weigh their patients' wishes as an important factor before sharing their health information. This investigation established that custodians must have some way to limit disclosure in order to properly consider patients' wishes.

In 2008, an individual complained that her health information had been included in the Alberta Netcare network without her consent. Once again in Investigation Report H2008-IR-001, we found that consent was not required to make the information available, but Alberta Health and Wellness, the manager of the system, had failed to provide a way for health care providers to reflect the expressed wishes of an individual. AHW then implemented a system that allows custodians to mask patient records in response to a patient's expressed wish. The health information is still shared but custodians must take an extra step to un-mask the data and an audit trail logs the un-masking decision. The availability of this option is extremely important to Albertans as a good compromise that gives a patient some ability to control who sees their health information, but the information is still available in an emergency.

As I said earlier, it was inevitable that disagreements over what the law meant would sometimes wind up in Court. When a party is dissatisfied with one of our Orders, they can apply to have it reviewed by the Courts. Since 2000, there have been 71 judicial reviews, of which 55 were judicial reviews of Orders (13 judicial review applications did not proceed). The OIPC first got noticed by the Courts in 2003. It was a case called *Alberta (Attorney General) v. Krushell* (2003 ABQB 252). The Court found we had interpreted our jurisdiction incorrectly. What was more significant was that the Court said that the Commissioner was not an expert tribunal, deserving of judicial deference. This was significant because expert tribunals seek to have the Courts give them deference. If the Courts give deference, the standard of reasonableness would be applied so that, theoretically, even if

the Court did not agree with the decision of the tribunal, it would stand as long as it was reasonable. Perhaps it was a matter of practice because in 2004, in a case called *Shields v. Information and Privacy Commissioner of Alberta* (2004 ABQB 353), the Court found that the decision in question was so close to the centre of our expertise that the standard of review should be deferential. The Court applied the reasonableness standard. It was very important to achieve this recognition from the Courts. Our relationship with the Courts in Alberta has been up and down. I suppose we have won as many as we have lost but we have lost some big ones. In 2009, in the Lycka case, the Court found that a doctor could use patient information to solicit contributions from patients, despite the wording of the *HIA*. In the first Alberta Teachers' Association case (2010 ABCA 26), the Court held, 2-1 that if we went over the 90 day limit for completing an inquiry, we lost jurisdiction. That has been appealed to the Supreme Court of Canada. The second Alberta Teachers' Association case (2011 ABQB 19) went much better. The Court upheld the OIPC's procedures, including the procedure for screening complaints when deciding whether the complaints will go to inquiry. The Court actually seemed to go against certain precedents in terms of the degree of standing afforded the Commissioner in a judicial review. Again in 2011, the Court of Appeal upheld the OIPC's interpretation of section 4 of the *FOIP Act* (2011 ABCA 36). Unfortunately, in Leon's Furniture (2011 ABCA 94), the Court of Appeal narrowed the definition of personal information under *PIPA*, to exclude information that is related to an object or property, such as a license plate number and (obiter) a VIN and a street address. A retailer's collection of an individual's driver's license number to prevent fraud is reasonable. The only bright spot was that we were given full standing before the Court, in light of our role under *PIPA*. Although it is hard to get excited about a store writing down a driver's license number, this has serious implications for similar identifying numbers, like internet addresses, for example. We have applied for leave to appeal to the Supreme Court of Canada.

Overall the Courts have done a good job reviewing our application of very complex pieces of legislation. On a couple of occasions, I think the Court did not get it right. Some of those we appealed to the Court of Appeal. One of those has been heard by the Supreme Court of Canada and, on the Leon's decision, we have applied for leave to appeal. I have to admit that I have a bias here. But I think, with respect to some privacy cases, the Courts have had difficulty in seeing the broader implications of the collection and use of personal information. It is not easy; information technologies are changing so quickly and are becoming so pervasive that it is hard to see the forest for the trees.

As I said, public bodies became quite good at applying the law. One has to accept that there will be disputes over the law that have to go to Court. It was sometimes the things that happened outside of the law that caused us concern, particularly from an access to information perspective. Over the years, the *FOIP Act* has been amended to take certain information out of the *FOIP Act* and therefore render it inaccessible. Taking information out of the *FOIP Act* is called "paramountcy", which has resulted in energy and royalty information being removed from the *FOIP Act*.

We might have thought that access to information laws would usher in a spirit of openness and transparency across the spectrum of public bodies. It didn't, at least not universally. I think this is the case across Canada. It would be left to technology and human ingenuity to push accessibility. Some people running for public office have seen the need to use the power of information technology to embark on new paradigms for sharing information with the public, to achieve new forms of transparency and greater opportunity for dialogue with the public. Some municipalities have adopted "open data/open government" facilities to accomplish these things. Wikileaks demonstrated how difficult it is to keep state secrets and, indeed, may have raised the issue of whether existing notions of state secrecy are relevant any more. I think that the age of governments trying to rigidly control information and being able to spin it are passing. The difference is between obeying the law and disclosing information when required to do so and creating an environment where information is simply out there as a matter of course, to be debated, discussed and acted upon as a matter of the normal course of public affairs. The difference is largely one of attitude and approach.

In 2003, Alberta and British Columbia passed their *Personal Information Protection Act*s. In so doing, they joined Quebec and Canada as the only jurisdictions in Canada with comprehensive private sector privacy laws.

The decision was made to administer *PIPA* out of a Calgary office. It was believed that this would both get the attention of and access to the business community in Calgary, which is second in size to that in Toronto. An office in Calgary also opened up a new talent pool for the OIPC. Finally, a separate office would be able to go its own way to some extent, not being bound by what we had done in Edmonton, and we would all be richer for it.

The OIPC signed a tri-party Memorandum of Understanding which committed the three jurisdictions of Canada, Alberta and British Columbia, to cooperate and harmonize for the benefit of businesses across Canada. We were able to entice Quebec to the table but they were not willing to sign on.

In 2007, the OIPC did a joint investigation, with the Office of the Privacy Commissioner of Canada, of a massive data loss by the TJX group of companies in the United States. It was exhausting for both offices but it was an important event in terms of not only the outcome, but also the experience in dealing with such a massive loss and dealing with each other. TJX provided notice that a massive breach, a network computer intrusion, had compromised approximately 45 million payment cards in Canada, the United States, Puerto Rico, the United Kingdom and Ireland. The data included credit card numbers and expiry dates. An additional 330 Canadians had their names, addresses, telephone numbers and driver's license or other identification numbers stolen. The investigation determined that TJX had not had appropriate safeguards in place as its network had been accessed due to out-of-date security measures. The investigation further determined that TJX had not limited its collection of personal information to a reasonable extent and had not had reasonable retention and destruction policies in place. As a result of the breach, TJX agreed to improve its security, review its personal information collection practices and implement retention and destruction policies.

As with the other statutes, *PIPA* provides for a complaint to be made and the Commissioner to investigate. In P2010-IR-002 (Pierson's Funeral Service Ltd.), about one month after the Complainant's wife's death, he received a Client Satisfaction Survey from a US service provider on behalf of the funeral home that had provided funeral services for his deceased wife. The Complainant's personal information had been provided to the service provider without notice or consent. The Assistant Commissioner, *Personal Information Protection Act* found the funeral home had not properly obtained consent or provided notice and had contravened sections 7(1)(c) and 13 of *PIPA*. The funeral home also had no privacy policy as required by section 6 and it had not safeguarded personal information in its custody or control as required by section 34 of *PIPA*. The Assistant Commissioner recommended the funeral home amend its privacy practices to be compliant with *PIPA*, and in particular to obtain proper consent from clients before using their personal information for surveys, to review its policies to ensure compliance, to safeguard personal information and to develop a retention and destruction policy as required by section 35 of *PIPA*.

In P2010-ND-008 (the Equitable Trust Company), in October 2010, an unencrypted, password protected, company-issued laptop was stolen from an employee's vehicle. The laptop contained sensitive personal information of approximately 135 clients including: names, addresses, mortgage applications, SINs, credit bureau reports, income, employer, payment history, telephone numbers and mortgage balances. Another 2,870 clients had personal information in various reports on the laptop including names, addresses, account numbers and mortgage balances. The Organization explained that the account number was an internal identifier used for loans and could not be used to access additional information. The Commissioner determined that the 135 individuals with sensitive personal information in the laptop were at risk for identity theft and the Organization was required to notify them. The Commissioner did not require the Organization to notify the other 2,870 clients as that information could not be used to cause significant harm.

Two amendments to *PIPA* were of particular significance. In 2005, we asked for and got the ability to share information and enter into agreements with other Information and Privacy Commissioners. This is important because privacy laws must function nationally, even internationally. In 2009, following a legislative review of *PIPA*, amendments were made to *PIPA* in which Alberta became the first jurisdiction in Canada to adopt mandatory breach notification. During the legislative review, the OIPC specifically asked the Select Special Committee to recommend requiring organizations to report losses of information to the Commissioner and to give the

Commissioner the power to decide whether or not there should be notification to affected persons. The OIPC knew it was risky; the OIPC was, in effect, setting ourselves up as insurers. If we decided there was no real risk of significant harm and therefore no need to notify, and people did get harmed, the blame would fall to the OIPC. But having the Commissioner do it would make for more uniform reporting, more consistent application of the standard (real risk of significant harm) and better notification where notification was required. Furthermore, people would be spared a steady stream of spam-like notices for minor losses. Since breach notification came into force on May 1, 2010, we have had 97 breach notifications. We are now processing about 8 reports a month. We do not have enough resources to handle this increased caseload. From what I have seen from the breaches reported to date, it may be time for the Government to consider legislating penalties where reasonable security measures were not taken and information was lost as a result.

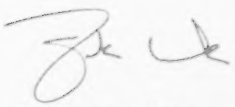
As a society, we are sometimes like Neanderthals running loose in the Information Age. We have incredible capacity to collect, use and disclose personal information but we seem to be unconscious when it comes to securing it, taking care of it. Laptops and memory sticks containing huge amounts of personal information are lost or abandoned regularly and they are usually not encrypted. Paper containing sensitive personal information is regularly tossed in dumpsters or otherwise abandoned. We have tried to use the media and public presentations to educate organizations in this regard, but the apparent carelessness shown with respect to personal information across the board remains a source of concern.

In 2009, the *HIA* was amended following a review that began in 2008. The OIPC's submission to the Standing Committee on Health was primarily concerned about the repeal of section 58, which was the provision that required custodians to consider the wishes of patients respecting their health information. The amendments would have removed any option for the custodian to give effect to those wishes. Together with the Alberta Medical Association, we were able to persuade the Government to table and review the Bill. It was amended to address our concerns.

In conclusion, these are a few of the significant events in the life of the OIPC over the past eleven years. Of course an institution gains its reputation from more than just a few cases and decisions. Thousands of cases have been reviewed and mediated. There are hundreds of presentations made to thousands of people and organizations about the legislation. There are hundreds of Orders issued from the OIPC. Thousands of privacy impact assessments have been reviewed. As much as anything, it is the quality of this largely unsung work that gives the OIPC credibility and significance to Albertans.

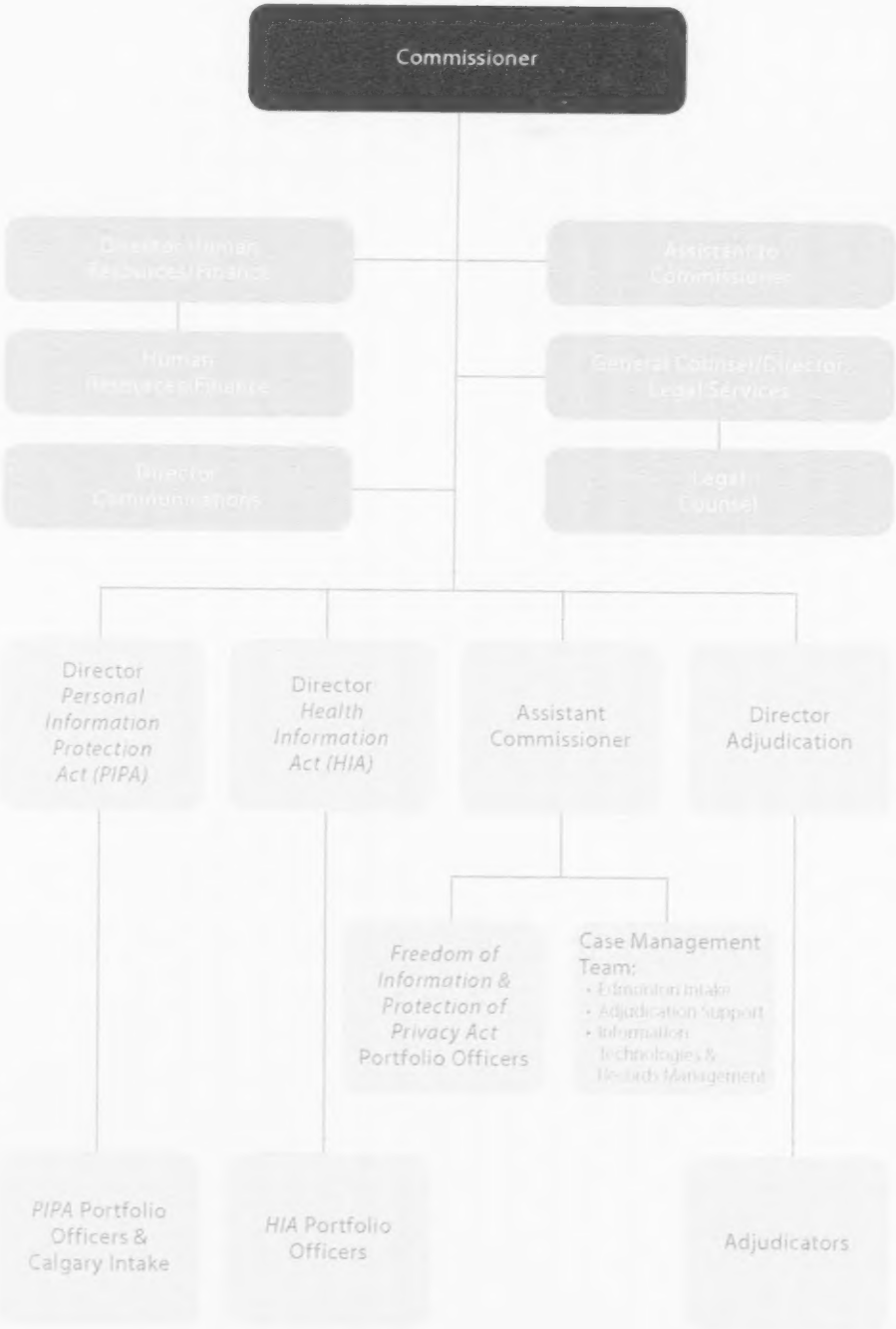
Over the 10 years that I have been Commissioner and the 16 that I have worked in the OIPC, a lot has changed. From one statute and 6 employees, the OIPC has gone to 3 statutes and almost 40 employees. The OIPC administers 3 laws and is one of 4 jurisdictions to have a private sector privacy statute and the only province to have mandatory breach notification. The OIPC has overseen the development of Netcare, the Alberta electronic health record, from a few disparate electronic records to a province-wide record with upwards of 30,000 users. From one person writing Orders, there are now 7. In 2000-01, our budget was $2.7 million; in 2011-12, $5.7 million.

To the staff of the OIPC, past and present, I would say continue to work to the same high professional standards as you always have. It has been wonderful working with you. I believe the OIPC has done excellent work for the Province in carrying out the Commissioner's mandate. I am sure that it will continue to do so. It has been my privilege and my pleasure to have served the people of Alberta.

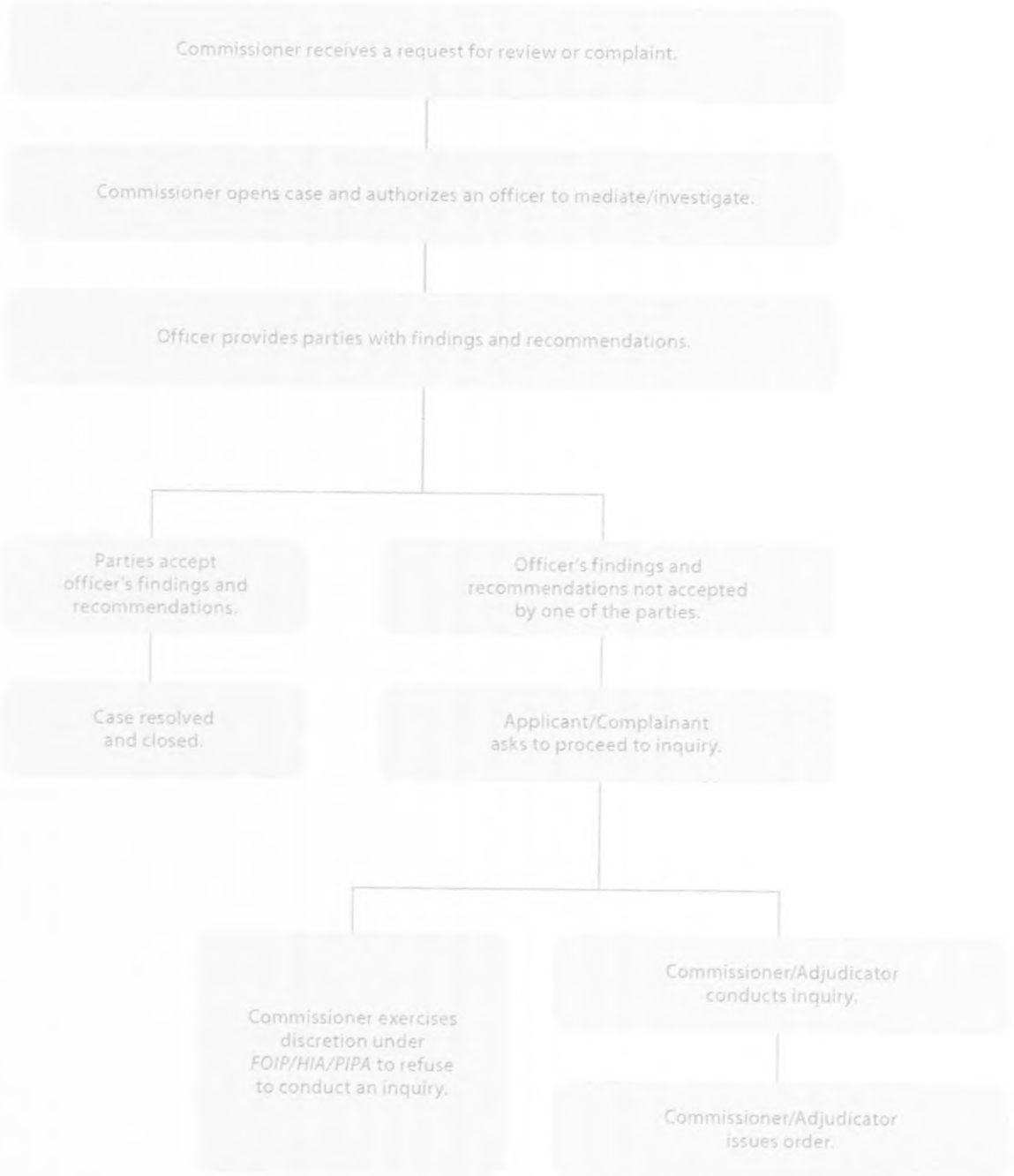


Franklin J. Work Q.C.
Information and Privacy Commissioner of Alberta

ORGANIZATIONAL STRUCTURE 2010-11



THE PROCESS: REQUEST FOR REVIEW/COMPLAINT


Commissioner receives a request for review or complaint.
Commissioner opens case and authorizes an officer to mediate/investigate.
Officer provides parties with findings and recommendations.
Parties accept officer's findings and recommendations.
Officer's findings and recommendations not accepted by one of the parties.
Case resolved and closed.
Applicant/Complainant asks to proceed to inquiry.
Commissioner exercises discretion under FOIP/HIA/PIPA to refuse to conduct an inquiry.
Commissioner/Adjudicator conducts inquiry.
Commissioner/Adjudicator issues order.

OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER

2010-11 Overview

Total Cases Opened	1,372
Total Cases Closed	1,353
Total Orders Issued	64
Total Non-case Related Calls, Emails and Written Enquiries Received	4,111

Breakdown of Cases Opened in 2010-11 by Legislation

	FOIP	*HIA*	*PIPA*	Total
Cases Opened	397	709	266	1,372

Comments:

- 49% of cases opened under *FOIP* were related to access to information requests.
- 72% of cases opened under *HIA* were privacy impact assessments from custodians.
- 52% of cases opened under *PIPA* were privacy complaints.
- 67% of the *FOIP* cases and 80% of the *PIPA* cases were opened in response to requests or complaints from members of the public.
- 90% of *HIA* cases were opened in response to requests, reports or privacy impact assessments from custodians.

Breakdown of Cases Closed in 2010-11 by Legislation

	FOIP	*HIA*	*PIPA*	Total
Cases Closed	414	669	270	1,353

Comments:

- 79% of cases that could proceed to inquiry were resolved in the mediation/ investigation process.

Breakdown on Non-case Related Calls, Emails and Written Enquiries

	FOIP	*HIA*	*PIPA*	Non-Jurisdictional	Total
Non-case Enquiries	923	720	2,369	99	4,111

Comments:

- 80% of the *FOIP* non-case calls, 54% of the *HIA* non-case calls, and 72% of the *PIPA* non-case calls are made by members of the public.

Financial Overview

The Standing Committee on Legislative Offices, Legislative Assembly, approves the budget of the Office of the Information and Privacy Commissioner. The approved budget for 2010-11 was $5,666,000 for operations and $75,000 for equipment purchases. The total budget of $5,741,000 was unchanged from the previous year.

Operating Expenses	
Voted budget	$ 5,666,000
Actual expenses	5,459,467
Difference	**$ 206,533**

Equipment Purchases	
Voted budget	$ 75,000
Actual expenses	93,949
Difference	**$ (18,949)**

We returned $187,584 (3.3% of our total budget) to the General Revenue Fund of the Province of Alberta for the 2010-11 fiscal year. The salaries, wages, and employee benefits budget was almost fully expended (99.5%). Savings were due primarily to reduced expenditures for supplies and services.

Variance of this year's total actual operating costs compared to budget

Salaries, wages, and employee benefits make up approximately 79% of our operating expenses budget. Our expenses were $22,249 below budget due primarily to a vacant position, decreased employer contributions, and decreased staff development. These savings were offset by increased salary expenses.

Supplies and services were $161,812 under budget due primarily to decreased consulting services, decreased purchases of office supplies and computers, and less travel due to travel restrictions. Part of the under expenditure was reallocated to equipment purchases.

Variance of this year's total actual operating costs to last year's

Salaries, wages, and employee benefits increased from the previous year by $362,579, due primarily to staff returning from parental leaves, increased salaries and related employer contributions, and increased staff development.

Supplies and services decreased from the previous year by $74,962. The decrease is due primarily to a reduction of other purchased services. Legal fees for judicial reviews and other legal matters were slightly lower than the previous year. Many of our judicial reviews are ongoing and in various stages and we often incur legal costs for judicial reviews that do not proceed. This year we had seven decisions on judicial review and appeal, compared to the previous year where we had fourteen decisions. A substantial portion of our legal costs were incurred moving a matter to the Supreme Court of Canada. No decision has been rendered as of the issue date of the financial statements.

Equipment Purchases

We budgeted $75,000 for information technology purchases, but had expenses of $93,949 for a virtualization project, exchange server and video conferencing equipment. This increase was funded by savings in supplies and services.

THE *FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT*

October 1, 2010 was the 15th anniversary of the *Freedom of Information and Protection of Privacy Act* ("the *FOIP Act*"). The *FOIP Act* came into effect for provincial government ministries, boards, agencies and commissions on October 1, 1995 and was subsequently extended to schools (September 1998), health authorities (October 1998), universities and colleges (September 1999) and local government bodies such as municipalities and police services (October 1999).

The purposes of the *FOIP Act* are:

- To allow a person a right of access to any record in the custody or under the control of a public body, subject to limited and specific exceptions.
- To give individuals, subject to limited and specific exceptions, a right to request access and a right to request corrections to their personal information that is held by a public body.
- To protect privacy by setting out the circumstances under which a public body may collect, use or disclose personal information.

The Commissioner and his Office provide independent reviews on decisions made by public bodies and the resolution of complaints. Under the *FOIP Act*:

- Applicants may ask the Commissioner to review any decision, act or failure to act of the head of a public body in relation to their access request.
- Third Parties may ask the Commissioner to review a public body's decision to release their business or personal information in response to an applicant's access request.
- Individuals may ask the Commissioner to review a public body's response to their request for correction of their personal information.
- If an individual believes a public body has collected, use or disclosed their personal information in contravention of the *FOIP Act*, the individual may ask the Commissioner to review that matter.

The Commissioner may initiate investigations on his own motion to ensure that public bodies are in compliance with the *FOIP Act*.

Review of the *FOIP Act*

On April 13, 2010, the Legislative Assembly passed a motion appointing the Standing Committee on Health ("the Committee") to review the *FOIP Act* as provided by section 97 of the *FOIP Act*. This is the fourth review by an all-party committee since the *FOIP Act* was introduced in 1993.

The Committee commenced its review on April 28, 2010. The Commissioner forwarded a written submission to the Committee on June 29, 2010 and made an oral presentation before the Committee on July 7, 2010. The Office of the Information and Privacy Commissioner (OIPC) also provided technical support and assistance to the Committee during its review of the *FOIP Act*.

The Committee tabled its report to the Legislative Assembly on November 15, 2010. The report makes 24 recommendations.

Statistics

In 2010-11, the OIPC opened 397 cases and received 923 non-case related enquiries in relation to the *FOIP Act*.

67% of the cases opened were in response to requests or complaints from members of the public. The public account for 80% of the non-case related enquiries received by the OIPC.

The OIPC closed 414 cases in 2010-11. 79% of cases that could proceed to inquiry were successfully resolved through the mediation/investigation process. 42 cases were closed as a result of orders issued by the Commissioner or adjudicators and 21 cases were closed by the Commissioner's decision to refuse to conduct an inquiry.

Consultations and Presentations

The OIPC continued to provide comment and consultation to public bodies on initiatives and proposed legislation in relation to access and privacy matters.

The OIPC also continued to support the University of Alberta's annual Access and Privacy Conference with participation on the Advisory Committee and conducting presentations at the conference.

The OIPC developed a half hour presentation on privacy for the Legislative Assembly Office's School at the Legislature (SATL) program. In 2010-11, staff from OIPC made 7 presentations to grade six students and teachers in the SATL program.

Open Government/Data

On September 1, 2010, Commissioners from federal, provincial and territorial jurisdictions across Canada jointly released the Open Government Resolution to promote transparency and accountability through proactive disclosures and disclosures in open, accessible and reusable formats.

"Making Data Public" was the theme of the Commissioner's Right to Know forum on September 30, 2010. Right to Know is an annual event that is celebrated in over 40 countries worldwide to promote access to information as part of public accountability and transparency. At the Commissioner's forum, Chris Moore, Chief Information Officer with the City of Edmonton spoke on *"Open as a Way of Being"* and Shirley Howe, Deputy Minister of Alberta Employment and Immigration spoke on the *"Public Release of Workplace Injury and Fatality Records."* A total of 130 participants attended the Commissioner's Forum.

Open government data principles are being developed in partnership with the City of Edmonton. The Commissioner has also met with the City of Calgary and various government ministries in relation to potential open data initiatives.

Requests to the Commissioner's Office

In 2010-11, the OIPC received one request for access to information and one request for correction of personal information under the *FOIP Act*. Both applicants were informed that the records at issue were excluded from the application of the *FOIP Act* under section 4(1)(d) of the *FOIP Act*.

HEALTH INFORMATION ACT

The Health Information Act (HIA) regulates the collection, use and disclosure of health information, gives Albertans the right to access their own health information and to request corrections to their health information. The *HIA* applies to health information in the custody or control of "custodians," which include Alberta Health and Wellness, Alberta Health Services, and health committees, boards, panels, and health professionals designated in the *Health Information Regulation*. The *HIA* makes custodians responsible for fulfilling access and correction requests and for protecting health information privacy.

Under the *HIA*, the Commissioner has a mandate to review:

- A decision made by a custodian about an individual's request to access or correct their health information; and,
- An individual's complaint that their health information has been collected, used or disclosed in contravention of the *HIA*.

Statistics

The OIPC opened 709 cases under the *HIA* in 2010-11. The majority of these cases (510) were privacy impact assessments. The numbers of privacy complaints (26) and requests from individuals to review custodians' responses to access requests (31) are consistent with previous years. Under the *HIA*, 87% of complaints and requests for review in 2010-11 were closed through mediation. Custodians self-reported 43 privacy breaches in 2010-11, which is also similar to the previous year. Interestingly, most custodians who self-report privacy breaches also go on to voluntarily notify those patients affected by the breach (there is no requirement to notify affected individuals about privacy breaches under the *HIA*). In our opinion, this relatively high level of voluntary self-reporting and notification is reflective of health services providers' professional obligations to protect patient confidentiality. The Commissioner opened 17 separate offence investigations under the *HIA* in 2010-11, which is a large increase over the previous year, however 14 of these offence investigations relate to a single matter involving multiple health services providers.

Health Information Amendment Act (Bill 52)

On September 1, 2010, the *Health Information Amendment Act (HIAA)* was proclaimed in force. Through these amendments, the *HIA* now applies to all health services, regardless of whether they were paid for under the public health system or privately; new health professions were added to the definition of custodian; and, privacy measures available to individuals were reinforced. For example, individuals may now request an audit report of who has viewed their health information in electronic systems. Further, the *HIAA* made health professional colleges responsible for developing standards of practice for privacy, security and records management as a prerequisite to their members using the provincial electronic health record system, Alberta Netcare.

New Custodians designated in 2010-11

The *HIAA* established a schedule designating members of professional groups as custodians under the *HIA*. Members of the College of Physicians and Surgeons of Alberta and the Alberta College of Pharmacists have been custodians since 2001 and remained so on proclamation of the *HIAA*. In September 2010, regulated members of the following new health professional colleges and associations joined physicians and pharmacists to become custodians under the *HIA*:

- Alberta College of Optometrists
- Alberta Opticians Association
- Alberta College and Association of Chiropractors

- Alberta Association of Midwives
- Alberta Podiatry Association
- College of Alberta Denturists

In March 2011, members of the following professional colleges and associations became custodians under the *HIA*:

- Alberta Dental Association and College
- College of Registered Dental Hygienists of Alberta

Members of the College and Association of Registered Nurses of Alberta are scheduled to become custodians next fiscal year, in September 2011.

Outreach

The OIPC is committed to working closely with health professional colleges to guide them in helping their members comply with the *HIA*. In 2010-11 the *HIA* team established contact with all of the new health professional colleges and associations and helped to introduce their members to their new responsibilities under the *HIA* by making presentations to professional college boards and offering seminars at conferences and training events.

Privacy Impact Assessments

Privacy Impact Assessments (PIAs) identify and address privacy risks associated with a new initiative. Under section 64 of the *HIA*, custodians must prepare a PIA before they implement new systems or administrative practices that collect, use or disclose health information. Custodians must submit their PIAs to the Commissioner for review and comment.

In 2010-11, custodians submitted 510 PIAs to the Commissioner. This figure is down from 2009-10, when 680 PIAs were submitted. The previous year's surge in PIAs reflected a major push to deploy Alberta Netcare in the pharmacy sector. As the new custodians listed above begin submitting PIAs, the upward trend in PIA reviews seen over the past several years is expected to resume. The *HIA* team has been able to review the high volume of PIAs thanks to expedited PIA processes negotiated with custodians participating in major health systems initiatives, such as Alberta Netcare and the Physician Office System Program.

New PIA Requirements

In April 2010, the OIPC launched new Privacy Impact Assessment (PIA) Requirements, replacing the former PIA questionnaire, first introduced in 2001. Since 2001, the practice of conducting PIAs matured considerably, as did our understanding of how custodians approached PIAs. The new PIA Requirements reflect this learning and provide more detailed guidance to help custodians fulfill their duties under the *HIA*. The new PIA Requirements are mandatory for *HIA* custodians, but may be used as a reference by public bodies under *FOIP* and organizations under *PIPA*.

Investigation Report H2010-IR-002

A property management company reported that it had found 10 boxes of medical records in office space it had formerly rented to a Red Deer physician. The responsible physician's practice had moved prior to the incident and the investigation revealed that the physician had not conducted an inventory of records after the move to ensure all records were accounted for. The investigator found the physician contravened section 60 of the *HIA*, which says that custodians must protect health information from reasonably anticipated threats to the privacy of health information. In this case, the custodian failed to protect against the reasonably anticipated threat that records may be lost or misplaced during an office move. The records were returned to the physician, who conducted an inventory and committed to adopting measures to prevent similar incidents in the future.

PERSONAL INFORMATION PROTECTION ACT

The *Personal Information Protection Act ("PIPA")* applies to provincially-regulated private sector organizations operating in Alberta. The Act provides rules respecting the collection, use and disclosure of personal information – defined in the Act as "information about an identifiable individual." *PIPA* seeks to balance the right of an individual to have his or her personal information protected, with the need of organizations to collect, use or disclose personal information for reasonable purposes.

The number of new complaints made under *PIPA* in fiscal year 2010-11 was 266, which represents a decrease of 9% from the previous fiscal year. Fifty-two per cent (52%) of these new cases were privacy complaints, concerning issues such as collection, use, disclosure, and safeguarding of personal information. Twenty-seven per cent (27%) of new cases were requests for the Commissioner to review an organization's response to an individual's request to access his or her own personal information.

The majority of new cases involved the following industries:

- Retail: **16%**
- Other Services (including unions, professional regulatory organizations, condominium corporations, and religious organizations): **14%**
- Real Estate, Rental, Leasing: **12%**
- Professional, Scientific & Technical: **8%**
- Private Healthcare and Social Assistance: **7%**

The most common types of complaints against organizations received by the Commissioner this fiscal year are as follows:

- Consistently over the last couple of years, complaints have been received about organizations recording information from customers' drivers' licenses, e.g. when a customer pays by credit card;
- Photocopying various forms of government ID when it is sufficient to view the ID to verify identity; and
- A significant number of complaints involving personal information of employees, e.g. complaints about:
  - Video surveillance in the workplace;
  - Organizations giving bad references for former employees;
  - Employers collecting too much medical information of employees, and sharing this information in the workplace; and
  - Employees not being satisfied with the responses they have received when seeking access to their personal information held by their employers.

The number of Self-reported Breaches increased significantly this fiscal year, given the amendments to the *PIPA* which require organizations to report incidents where there exists a real risk of significant harm to an individual. The Act also empowers the Commissioner to require organizations to notify individuals to whom there is a real risk of significant harm as a result of such an incident. These ground breaking amendments to *PIPA* came into force on May 1, 2010 and are the first such law in Canada. Forty-nine (49) new cases were opened when organizations self-reported privacy breaches. This represents a substantial increase of over three times the number of reported breaches compared with the previous fiscal year (15 breaches were self-reported in 2009-10).

The top causes of such incidents have been:

- Break-in/theft (including stolen laptops with no encryption),
- Mailing error (personal information sent to the wrong address or wrong person, or personal information included on mailing address),
- Personal information going missing during courier or mailing transmission,
- Unencrypted USB or media storage devices,
- Network attacks (sophisticated malware and social engineering techniques designed to evade easy detection by conventional security tools).

Two cases were opened on the Commissioner's own motion this year, compared to one in the previous fiscal year.

PIPA staff responded to 2,369 telephone, email and written enquiries from individuals and organizations this fiscal year which represents a decrease of 8% from the previous fiscal year.

A total of 271 cases were closed in 2010-11, an increase of 1% over the previous year. Of these cases, 220 had the potential to be decided at Inquiry; instead, 172 (78%) were resolved through the more informal mediation/investigation process.

BREACH NOTIFICATION DECISIONS

A total of 49 breach notification decisions were issued by the Commissioner during the fiscal year of 2010-11. Of these decisions, 17 breach notification decisions were published as only those decisions in which the Commissioner requires that an organization notify individuals to whom there is a real risk of significant harm are posted on the OIPC website at www.oipc.ab.ca. Here are some significant breach notification decisions by the Commissioner published in 2010-11.

KNIGHTS OF COLUMBUS CHARITABLE FOUNDATION (P2010-ND-001)

The Commissioner decided that there was a real risk of significant harm to individuals when underwriting documents (including Social Insurance Numbers, financial account numbers and drivers' license numbers) were found outside the organization's headquarters. In this case a real risk of significant harm exists given the moderate to high sensitivity degree of the information and the fact that the cause of the breach was unknown. Although the incident occurred in the United States, the Commissioner had jurisdiction as the personal information included that of a number of Albertans, which was collected by an organization licensed to operate in Alberta.

RADCAN ENERGY SERVICES (P2010-ND-004)

The Commissioner decided that there was a real risk of significant harm to an individual when personal information about his potential termination was accidentally shared with other employees (they were cc'd in an email on another issue that also contained the personal information of the affected employee) by the Human Resources Manager. The Human Resources Manager communicated to the employees who had seen the personal information and advised them that the email was sent accidentally and should not be discussed with anyone and also notified the affected employee of the error and the action it had taken with respect to the cc'd employees. For an organization to be required to notify an affected individual there must be some harm (damage or detriment) that could be caused as a result of the incident and the harm must be significant (important, meaningful with non-trivial consequences or effects). In this case, the Commissioner decided that a real risk of significant harm existed as he determined the harm is the damage to the reputation of the employee whose possible termination was disclosed. Given the sensitivity of the information, the Commissioner required the organization to notify the affected employee and acknowledged that the organization had already done so in accordance with s.19.1 of the *Personal Information Protection Act Regulation* and therefore did not require the organization to notify the affected employee again.

FULL BARS COMMUNICATION INC. (P2010-ND-005)

The Commissioner decided that there was a real risk of significant harm to individuals when unencrypted external hard drives were stolen from the business owner's home garage; the hard drives contained information of current and former employees (including Social Insurance Numbers, and drivers' license numbers) and customers (including truncated credit card numbers). The Commissioner determined that a real risk of significant harm existed given that the information at issue has moderate to high sensitivity degree and the fact that the information was unencrypted and stolen. Notification of the customers was not required, as truncated credit card numbers are unlikely to be used for fraudulent purposes or to perpetuate identity theft. However, the Commissioner required the organization to notify its former and current employees as a result of the incident.

AVISCAR INC. (P2011-ND-001)

The Commissioner decided that there was a real risk of significant harm to individuals when a key logger was inserted in a car rental agency's computer system; the key logger stole highly sensitive data (credit card numbers) which were stolen and subsequently fraudulently used. The Commissioner rejected the argument that the card issuers should provide notification to 706 affected customers since they are in a position to determine if cards have been used fraudulently – the agency is the organization required by *PIPA* to provide notification, and the point of notification is to provide customers an opportunity to take steps to prevent or mitigate any risk of harm (whether fraudulent charges have appeared or not is irrelevant to providing notification). The Commissioner decided that notification was required as a real risk of significant harm existed due to the sensitivity of the information as it provides comprehensive individual profiles that could be used for identity theft or fraud and the fact that the information had already been used fraudulently.

CASE SUMMARIES

The OIPC published one (1) *PIPA* Case Summary in the fiscal year 2010-11. Case summaries are posted on the OIPC website when they have educational value for other organizations.

FINANCIAL INSTITUTION PROPERLY REFUSED INDIVIDUAL'S REQUEST TO ACCESS INFORMATION ABOUT A DECEASED INDIVIDUAL'S ACCOUNTS (P2011-CS-001, FEBRUARY 2011).

The Applicant, a beneficiary of a deceased individual's estate, requested information about the deceased's accounts from ATB Financial ("ATB") which were joint accounts with other individuals. ATB refused to provide the Applicant with the information the Applicant requested on the grounds that (1) based on its records, the Applicant was never added as an account holder to any of the deceased's joint accounts; (2) the Applicant was seeking access to the joint accounts of other persons; and (3) the personal information of the joint operators of the accounts was protected by the *Personal Information Protection Act ("PIPA")*.

ATB advised the Applicant that since he was seeking access to the personal information of other persons, pursuant to s.61(1)(h) of *PIPA*, he would need written authorization from the joint owners of the accounts before it could grant him access to the personal information. Alternatively, he could present legal documentation as required by s.61(1)(d)(i) of *PIPA* showing he was the deceased's personal representative and had the power to administer the deceased's estate. If he was not satisfied with ATB's response to his access request, ATB advised the Applicant he could contact the Office of the Information and Privacy Commissioner and request a review of the decision under s.46 of *PIPA*. The Applicant requested a review of ATB's response.

The Investigator found that the information requested by the Applicant was not his personal information but rather the personal information of other individuals, including a deceased individual. *PIPA* does not give an individual the right to access the personal information of other individuals, living or deceased. Section 24 of *PIPA* only allows an individual to access his or her own personal information. ATB had an obligation under s.34 of *PIPA* to implement reasonable security measures to protect the personal information of individuals, including deceased individuals, from unauthorized disclosure.

In short, ATB had an obligation not to release personal information of others to the Applicant unless the Applicant could establish that he had the right to exercise the deceased's or the other individuals' rights under *PIPA* pursuant to s.61(1) of *PIPA* – either he had the consent of those individuals (s.61(1)(h)) or, in the case of the deceased, was the deceased's personal representative (s.61(1)(d)(i)).

OTHER ACTIVITIES

Amendments to the *Personal Information Protection Act* and the *Personal Information Protection Act Amendment Regulations* came into effect May 1, 2010. These amendments include requirements for organizations to securely destroy or render personal information non-identifying, (when personal information is no longer reasonably required for legal or business purposes), notify the Commissioner in the event of a security breach (where there is a real risk of significant harm) and update policies and privacy notices where personal information is provided to service providers outside Canada (the organization must provide contact information for a person who can answer questions about the management of personal information). A new exception is created to the requirement to obtain consent for the collection, use and disclosure of personal information for the purposes of conducting an audit – an organization conducting an audit can collect and use personal information for the purposes of the audit if it is impracticable to use non-identifying information. The definition of employee has been expanded to include a partner, director, officer or other office-holder of the organization, and personal employee information now includes potential, current and former employees.

To educate and increase awareness of the *PIPA* amendments, the OIPC and Service Alberta, Policy and Governance (formerly Access and Privacy Branch) published several information sheets and resources. These publications are outlined below.

OIPC

- **Reporting a Breach to the Commissioner,** which sets out the minimum requirements for what must be included in a Report to the Commissioner;
- **Breach Report Form**, which can be used to submit a report to the Commissioner;
- **Office of the Information and Privacy Commissioner's Process for Determining Whether to Require Notification**, outlines the Commissioner's process for determining whether to require an organization to notify individuals in circumstances where the real risk of significant harm to an individual as a result of the loss or unauthorized access or disclosure is obvious and immediate;
- **Notifying Affected Individuals**, which sets out the minimum requirements for what must be included in a notice to individuals of a breach, and explains the new requirements for organizations to notify the Commissioner of certain breaches involving personal information; and
- **Key Steps in Responding to Privacy Breaches**, which provides guidance to organizations for dealing with a security breach.

Service Alberta

- ***PIPA* Information Sheet 10:** *Personal Information Protection Amendment Act, 2009* – Explains the amendments to the Act that came into force on May 1, 2010.
- ***PIPA* Information Sheet 11:** *Notification of a Security Breach* – Explains the new requirements for an organization to notify the Information and Privacy Commissioner and individuals of a significant security breach involving personal information in the organization's control.
- ***PIPA* Information Sheet 12:** *Service Providers Outside Canada: Notification, Policies and Practices* – Discusses the notification and policies and practices requirements for organizations that use service providers outside Canada to collect, use, disclose or store personal information.

Also in fiscal year 2010-11, the OIPC continued to work closely with the Office of the Privacy Commissioner of Canada and the Office of the Information and Privacy Commissioner of British Columbia to provide compliance resources for private sector businesses.

In early 2011, the federal Privacy Commissioner's Office, and the Alberta and British Columbia Information and Privacy Commissioners teamed up to release a free personal information security assessment tool for organizations which will expectantly prevent breaches of personal information. The tool which is an in-depth questionnaire is designed for mid-size and larger organizations to see if they are meeting compliance standards under Canada's private sector privacy laws on both federal and provincial levels.

In another joint effort between Alberta and British Columbia, the two Offices co-hosted the 5th annual *PIPA* Conference in Calgary, Alberta. Over the course of the past five years, this one-of-a-kind conference has attracted over 1,200 participants from businesses, non-profit organizations, governments, and law firms from around the world. The focus of the 2010 *PIPA* conference was on practical, real-world problems and solutions. The forum offered an opportunity to hear from privacy regulators, stakeholders, and from business experts around the globe about managing personal information in the electronic age.

Highlights of the 2010 Conference included keynote speakers:

- Aritha Van Herk, Professor, Writer, University of Calgary
- Michael Geist, Canada Research Chair of Internet and E-Commerce Law at the University of Ottawa
- Brad "RenderMan" Haines, Professional Hacker/Security Consultant

Concurrent sessions included:

- Privacy mistakes made by employers and employees and how to avoid them
- You put that online? Blogging, social networking, and workplace privacy
- Business continuity and pandemic planning: privacy, information security, and information safety in crisis
- Workplace investigations: collecting, using and disclosing personal information and responding to requests for access
- Critical elements of effective data destruction policies
- How to map out a privacy architecture in a clouded world

In fiscal year 2010-11, the OIPC also continued its efforts to consult with other regulators, industry associations, and government to ensure continued dialogue regarding privacy issues. Key consultations were held with the Alberta Human Rights Commission, Alberta Gaming and Liquor Commission, the Retail Council of Canada, Service Alberta – Policy and Governance, the International Association of Privacy Professionals (IAPP), the Calgary Police Service and the Edmonton Police Service.

In addition, *PIPA* presentations were provided to numerous industry associations and at conferences, including the Calgary Bar Association, Independent Financial Brokers, the Canadian Institute, 2011 Privacy and Access to Information Conference, Credit Union Internal Audit Committee, Universities of Alberta, Athabasca, Calgary and Lethbridge.

An Adjudicator found that Organizations posted malicious posters about an individual – Orders P2009-013 and P2009-014 (June 2010)

An individual complained that two Organizations posted posters of him around town, in contravention of the *Personal Information Protection Act (PIPA)*. The posters consisted of an enlargement of the individual's driver's licence photograph and a caption suggesting that he was a danger to children. The RCMP concluded that the posters were a hoax and that the individual posed no danger to children.

Following a written inquiry as well as an oral hearing where the parties provided evidence and gave their version of events, the Adjudicator found that, on a balance of probabilities, the Organizations posted the posters. The individual had provided a copy of his driver's licence to them when he commenced employment, and the posters appeared during an ongoing acrimonious dispute between the Organizations and the individual after his employment ended. The Organizations suggested various other sources of the posters, but the Adjudicator dismissed those possibilities as unlikely.

The Adjudicator concluded that the posting of the posters by the Organizations was in contravention of *PIPA*, as there was obviously no justification.

An Adjudicator upheld the practice of a law firm of collecting in a database, and using and disclosing, personal information of police officers for the purposes of an investigation or legal proceeding – Order P2008-010 (September 2010)

An unnamed police officer brought a complaint under the *Personal Information Protection Act* that the Organization, the Engel Brubaker law firm, had created a database which it was using to collect and disseminate information of Edmonton Police Service members who had engaged in misconduct.

The Adjudicator confirmed the decision of the Organization to collect, use and disclose, and to enter and retain in its database, any personal information of police officers that is publicly available.

She also confirmed the decision of the Organization to collect, use and disclose, and to enter and retain in its database, any personal information of police officers that is reasonable for the purposes of an investigation or legal proceeding. This included any information that would be reasonable to collect, use and disclose to assist with an investigation and defence of a client in offence proceedings, for both existing and possible future offence proceedings in which the officer might be involved. It also included the personal information of officers that would be reasonable to collect, use and disclose to assist with an investigation for initiating an action against an officer that is reasonably in contemplation, and could be used and disclosed for pursuing such an action that is existing or reasonably in contemplation.

An Adjudicator ordered a condominium corporation to cease disclosing the personal information of a resident in contravention of the *Personal Information Protection Act* and to ensure that its members are aware of their obligations under sections 7 and 19 of the Act – Order P2010-005 (September 2010)

The Complainant complained that her personal information was disclosed by the president of the board of a condominium corporation, Whitehorn Village 1 Condominium Corporation, to another resident of the condominium and another individual contrary to the *Personal Information Protection Act (PIPA)*.

The Adjudicator found that the president was acting in her official capacity as a board member when she obtained the Complainant's personal information and then disclosed this information verbally to two individuals in a parking lot. Therefore, the Adjudicator found that the Complainant's personal information had been disclosed by the condominium board.

Further, the Adjudicator found that the condominium disclosed the Complainant's personal information without her consent and did not have a reasonable purpose for disclosing the Complainant's personal information.

This case establishes that condominium board officials must comply with their duties under *PIPA* when they collect, use, and disclose personal information they acquire in the performance of their duties to the condominium board.

The Commissioner concluded a lengthy oral proceeding under the *Freedom of Information and Protection of Privacy Act* relating to the use of an individual lawyer's personal information to run a CPIC search – Order F2006-033 (October 2010)

An individual, a lawyer, brought a complaint that his name had been used by various members of the Edmonton Police Service (EPS) to run queries on police information systems, on nine occasions, in the absence of the authorization required by section 39 of the *Freedom of Information and Protection of Privacy Act* (the *FOIP Act*). He also complained that the security arrangements for personal information in relation to such queries were not in accordance with the requirements of section 38 of the *FOIP Act*.

The Commissioner found that the EPS had demonstrated that it had authority under section 39 for conducting some of the queries, but that it had failed to demonstrate that it had authority for some of them, and that some of them had clearly been conducted for improper purposes and without authority. For one of these queries, the Commissioner also found that he did not believe the testimony of the member who had conducted the query.

With respect to reasonable security arrangements, the Commissioner held that the systems that were in place at the time the unauthorized queries were conducted were inadequate by reference to the requirements of section 38, both in terms of the training members had received as to the purposes for which running queries (and the associated collection and use of personal information) was permissible, and as to the absence of a requirement to give reasons and to enter the reason on the computerized information system. With respect to the current position, the Commissioner found that EPS has developed security arrangements against unauthorized access to the system, and the associated unauthorized use of personal information, that generally meet the standards of section 38.

An Adjudicator found that an individual was complaining about disclosure of business information, which is not governed by the *Freedom of Information and Protection of Privacy Act* – Order F2010-009 (October 2010)

An individual complained that the Agriculture Financial Services Corporation disclosed his personal information in contravention of the *Freedom of Information and Protection of Privacy Act* (the *FOIP Act*). However, the Adjudicator found that none of the information was the individual's "personal information" within the meaning of section 1(n).

Under section 1(n), "personal information" is recorded information about an identifiable "individual," which means a human being acting in his or her natural or personal capacity. In this case, the information was about the individual's farming operation, financial numbers, livestock, feed, equipment, crop insurance contract, insurance options, claims for payment and dollar values received for them. The Adjudicator found that this information was not about the individual in his natural or personal capacity, and that it did not otherwise have a personal dimension. Rather, the information was solely about the individual's business, the disclosure of which is not governed by the *FOIP Act* and therefore cannot be in contravention of it.

An Adjudicator held that an individual's insurance company was obliged by the *Personal Information Protection Act* to provide the individual with psychological reports about him rather than referring him to the professionals who had created the reports – Order P2010-007 (November 2010)

An individual requested that his insurance company, Great West Life Assurance Company, provide him with copies of all correspondence that related to him. This included reports authored by several psychiatrists and a psychologist. The insurance company did not provide the individual with several reports, but instead told the individual to obtain the information from his treating physician or psychologist.

The Adjudicator held that the insurance company had not fulfilled its duty under the *Personal Information Protection Act (PIPA)*. She held that it may be reasonable, in some circumstances, for the insurance company to provide an individual with access to his personal information through his treating physician or psychologist or, in the alternative, to arrange to have these healthcare practitioners review the content of the records with the individual prior to providing access. However, if these healthcare practitioners do not provide the individual with a copy of the records, *PIPA* requires that the insurance company make alternate arrangements through another healthcare practitioner or expert or provide the individual with access directly.

An Adjudicator reviewed an individual's request to correct his personal information under the *Personal Information Protection Act* – Order P2010-009 (November 2010)

Under section 25 of the *Personal Information Protection Act (PIPA)*, an individual asked an Organization to correct various errors that he believed to exist in his personal information. The Organization refused, but indicated that it had annotated the personal information with the requested corrections.

The Adjudicator found that the organization properly refused to make the requested corrections. Some correction requests were not regarding the individual's own personal information; some allegedly incorrect information was not subject to proof or verification; some correction requests were regarding opinions that must not be corrected under section 25(5) of *PIPA*, or else were observations reflecting what was observed at the time; and some correction requests were regarding the statements or views of third parties that were not shown to be inaccurately recorded. As the individual did not establish that there were any errors in his personal information that were subject to correction, the Adjudicator confirmed the Organization's decision not to make the requested corrections. The Adjudicator also found that the Organization had properly annotated the individual's personal information with the correction requests, as required under section 25(3) of *PIPA*.

An Adjudicator reviewed what can be disclosed as information about a third party's discretionary employment benefits under the *Freedom of Information and Protection of Privacy Act* – Order F2009-046 (December 2010)

An applicant asked the City of Calgary for records regarding pensions and retirement allowances paid to some of its senior officials. Under section 17(2)(e) of the *Freedom of Information and Protection of Privacy Act* (the *FOIP Act*), a disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if the information is about the third party's discretionary benefits as an officer or employee of a public body. In other words, information about a third party's discretionary benefits can be disclosed to an applicant.

Although the Adjudicator found that the pensions and retirement allowances were discretionary benefits under section 17(2)(e), he found that the provision contemplates the disclosure of certain information only. In particular, it permits the disclosure of the existence and nature of a discretionary benefit, who is entitled to the benefit and the formula for its calculation, all of which had already been revealed to the applicant in this case. In the Adjudicator's view, section 17(2)(e) does not normally capture the disclosure of specific dollar amounts paid, or the dates of payments. An applicant must point to some other basis, namely relevant circumstances in favour of disclosure under section 17(5) of the *FOIP Act*, in order to establish that disclosure of this more specific information would not be an unreasonable invasion of a third party's personal privacy.

An Adjudicator ordered Alberta Solicitor General and Public Security to reconsider its decision to withhold information under section 24(1) of the *Freedom of Information and Protection of Privacy Act*, as its purpose in withholding the information was irrelevant to the application of the provision – Order F2008-032 (January 2011)

The Applicant made a request for records from Alberta Solicitor General and Public Security (the Public Body) relating to a cost-benefit study conducted by KPMG of the Royal Canadian Mountain Police's (RCMP) performance as Alberta's contract provincial police force.

The Public Body identified a briefing note and a review entitled *Review of the Provincial Police Services Agreement* (the KPMG review) as records responsive to the Applicant's access request. The Public Body disclosed some information from the briefing note, but withheld the remainder of the information under sections 24(1)(a), (b) and (c) (advice from officials) and section 25 (harm to economic and other interests of a public body) of the *Freedom of Information and Protection of Privacy Act*. At the inquiry, the Public Body sought to apply section 21(1)(a) (harm to intergovernmental relations) to the information it had withheld.

The Adjudicator found that section 21(1)(a) did not apply to the KPMG review or the briefing note, as the Public Body had not established that disclosure of information in the KPMG review could reasonably be expected to harm intergovernmental relations between the Government of Alberta and another government or its agencies. She found that section 25 did not apply, as the Public Body had not established that disclosure could reasonably be expected to harm the economic interests of the Public Body or the Government of Alberta. She found that section 24(1)(a) applied to some information in the KPMG review and the briefing note. However, she found that the evidence of the Public Body established that it had withheld the KPMG review for the sole reason that the RCMP objected to its disclosure, and not for purposes recognized by section 24(1). She ordered the Public Body to reconsider its decision to withhold information under section 24(1), without consideration of the RCMP's objection. She ordered the Public Body to disclose the remainder of the information from the KPMG review and the briefing note.

In making this order, the Adjudicator considered the most recent statement on the exercise of discretion by the Supreme Court of Canada in Ontario *(Public Safety and Security) v. Criminal Lawyers' Association*, 2010 SCC 23, and followed it.

An Adjudicator ordered Staples Canada to take reasonable security measures to protect against unauthorized destruction or disposal of personal information – Order P2010-008 (January 2011)

A Complainant made a complaint to the Commissioner that the hard drive containing her family's personal information had gone missing from her family's laptop computer when she had given it to Staples Canada Inc. (the Organization) to repair. She asked the Commissioner to review whether the Organization's security measures, as they applied to the personal information of customers located on their computer hard drives, were in accordance with the *Personal Information Protection Act (PIPA)*.

The Adjudicator found that it was more probable than not that the Complainant's hard drive, and the personal information it contained, had been removed and destroyed while it was in the custody of the Organization. She also found that the Organization had not made reasonable security measures to protect the personal information contained in the hard drive from unauthorized loss or destruction, as required by section 34 of *PIPA*. In making this finding, the Adjudicator noted that it is not enough for an organization to guard against unauthorized access of personal information; it must also protect against unauthorized destruction or disposal of personal information.

She ordered the Organization to make reasonable security arrangements to prevent against the unauthorized destruction of personal information in the future on computer hard drives given to it by customers for repair.

An Adjudicator ordered the Edmonton Police Commission to take all reasonable and necessary measures, including legal measures, to obtain records requested by an applicant, as part of the duty to assist under section 10(1) of the *Freedom of Information and Protection of Privacy Act* – Order F2010-023 (February 2011)

An Applicant requested records under the *Freedom of Information and Protection of Privacy Act* (the *FOIP Act*), relating to a Chief of Police competition, from the Edmonton Police Commission (the Public Body). The Public Body located responsive records and responded to the Applicant. The Applicant was dissatisfied with the search conducted by the Public Body and requested that the Commissioner review the matter.

The Commissioner issued Order F2007-029 disposing of the issues between the parties.

In that order, he directed the Public Body to conduct a new search for responsive records, and to include records in the possession of Conroy Ross, an executive search firm, in that search. He also ordered the Public Body to respond to the Applicant openly, accurately, and completely.

The Public Body conducted a new search and made a new response to the Applicant. The Applicant requested review by the Commissioner.

At the inquiry, both the Public Body and Conroy Ross argued that the Public Body lacked control over the records. The Adjudicator determined that the contract between the Public Body and Conroy Ross established that any records in the possession of Conroy Ross, created as a result of performing its duties under the contract, were the absolute property of the City of Edmonton, acting on behalf of the Public Body. She found that the Public Body had control over the records because the contract gave the City of Edmonton, acting on its behalf, both proprietary and contractual rights to the records and the right to demand them.

The Adjudicator found that the Public Body had not met its duty to assist the Applicant under section 10(1) of the Act, as it had not taken any steps to obtain the records in the possession of Conroy Ross. Moreover, she found that the Public Body's new response to the Applicant was not complete or accurate.

The Adjudicator ordered the Public Body to take all reasonable and necessary steps, including legal measures, to obtain the records from Conroy Ross and to include these records in its response to the Applicant. She also ordered the Public Body to respond to the Applicant openly, accurately, and completely.

An Adjudicator ordered the Alberta Transportation Safety Board to stop disclosing more personal information than is necessary for meeting its authorized purposes for disclosing personal information – Order F2010-027 and P2010-020 (March 2011)

An individual complained that the Alberta Transportation Safety Board collected, used, and disclosed his personal information contrary to the *Freedom of Information and Protection of Privacy Act* (the *FOIP Act*).

The Adjudicator found that the Public Body had collected the Complainant's personal information from both Guardian Interlock (the company it had contracted to operate the ignition interlock program) and from the Interprovincial Records Exchange ("IRE"). However, the Adjudicator found that the Public Body was authorized to collect such information because it related directly to and was necessary for an operating program of the Public Body.

The Adjudicator also found that the Public Body used the Complainant's personal information to make a determination that he was no longer allowed to participate in the ignition interlock program it administered, which was consistent with the reason the information was collected.

Although the Adjudicator found that the Public Body disclosed the Complainant's personal information to Guardian Interlock in accordance with the *FOIP Act*, she found that it had disclosed more of the Complainant's information than was necessary. The only personal information the Public Body was authorized or required to disclose to Guardian Interlock was the Complainant's name, date of birth, driver's licence number (for identification purposes) and that his participation in the ignition interlock program has been revoked. In copying Guardian Interlock with a letter it had sent to the Complainant that contained more information than this, the Public Body had disclosed more of the Complainant's personal information than it was authorized or required to disclose.

JUDICIAL REVIEWS AND OTHER COURT DECISIONS

April 1, 2010 to March 31, 2011

LEON'S FURNITURE LIMITED v. ALBERTA (INFORMATION AND PRIVACY COMMISSIONER) – 2011 ABCA 94 – Appeal of the oral decision rendered by Nation J. on June 18, 2009, upholding Order P2008-004 (Court File Number 0801 12471)

An individual complained to the Commissioner that Leon's Furniture Limited ("Leon's") collected her personal information in contravention of the *Personal Information Protection Act ("PIPA")* when Leon's recorded her driver's licence number and licence plate number upon picking up merchandise ordered by her daughter.

The Adjudicator hearing the inquiry under *PIPA* held that Leon's was not in compliance with sections 7(2), 11(2) and 13 of *PIPA*, which are, respectively, the provisions concerning refusal to deal, extent of collection of personal information, and notification for collection. The Adjudicator ordered Leon's to cease recording drivers' licence numbers and licence plate numbers when an individual is picking up merchandise, and to destroy that information.

On judicial review of Order P2008-004, the Court of Queen's Bench held that the standard of review for the Adjudicator's decision was reasonableness and that the Adjudicator's decision was reasonable. The Court dismissed the Organization's application for judicial review.

On appeal, the Court of Appeal granted the Commissioner standing to make submissions. The Court of Appeal also held that the standard of review of the Adjudicator's decisions was reasonableness.

The Court of Appeal held that the Adjudicator's decision that a driver's licence number was personal information was reasonable, since a driver's licence number is uniquely related to an individual. However, the majority of the Court of Appeal held that the Adjudicator's decision that a licence plate number was also personal information was unreasonable because a licence plate number is linked to a vehicle rather than a person and is publicly displayed.

The majority of the Court of Appeal held that the purpose of Leon's policy was to prevent fraud, to assist in locating those responsible when fraud occurs and to ensure delivery to the right person, and that Leon's practice was reasonable for achieving those purposes.

Consequently, the majority of the Court of Appeal held that the Adjudicator's conclusion that Leon's policy on the delivery of goods to third parties was unreasonable was itself unreasonable because (i) it was influenced by the view that privacy rights prevail in all circumstances over the legitimate need to use information, and (ii) the Adjudicator thought that there were other reasonable ways that the business could be operated.

The majority of the Court of Appeal allowed the appeal from the order of the Court of Queen's Bench and quashed the Adjudicator's decision in Order P2008-004.

In her dissenting reasons, Conrad J.A. would have dismissed the appeal, on the basis that the Adjudicator did not err in the manner suggested, and that the Court of Queen's Bench was correct in dismissing the judicial review.

The Commissioner has applied to the Supreme Court of Canada for leave to appeal the decision of the majority of the Court of Appeal.

ALBERTA (INFORMATION AND PRIVACY COMMISSIONER) v. ALBERTA (*Freedom of Information and Protection of Privacy Act* ADJUDICATOR) – 2011 ABCA 36 – Appeal of 2009 ABQB 546, upholding Adjudication Order #6

The Complainant complained that the Commissioner disclosed his personal information contrary to the *Freedom of Information and Protection of Privacy Act* (the "*FOIP Act*") when the Commissioner sent a letter to the Complainant and copied that letter to three named individuals. The letter contained the Commissioner's decision to refuse to conduct inquiries into the Complainant's complaints under *PIPA*. The three named individuals copied on the letter were parties to the complaints.

An Adjudicator appointed under section 75 of the *FOIP Act* decided that section 4(1)(d) did not exclude the Commissioner's letter from the *FOIP Act*. Section 4(1)(d) excludes from the *FOIP Act* a record that is created by or for or is in the custody or under the control of an officer of the Legislature and relates to the exercise of that officer's functions under an Act of Alberta.

On judicial review of Adjudication Order #6, the Court of Queen's Bench upheld the Adjudicator's decision, on the ground that section 4(1) of the *FOIP Act* applied only when records were in the custody or control of a public body, but not when the records were "disseminated" (disclosed) outside of the public body. Consequently, section 4(1)(d) did not exclude the letter that the Commissioner sent to the Complainant and the other individuals.

On appeal, the Court of Appeal allowed the appeal and granted an order prohibiting the Adjudicator from proceeding with the complaint, for want of jurisdiction. The Court concluded that section 4(1)(d) of the *FOIP Act* should be given its plain ordinary meaning. Since the letter was created by or for the Commissioner in the exercise of his duties, the Court held that it was exempt from the *FOIP Act*, whether or not it left the Commissioner's office.

MOUNT ROYAL UNIVERSITY v. CARTER – 2011 ABQB 28 – Judicial Review of Order F2009-026

Under the *FOIP Act*, the Applicant requested access to records containing his personal information, including a communication about him created by the security services office of Mount Royal University (the "Public Body"). The Public Body located responsive records, but withheld a report created by the security services office, citing section 17 (information harmful to the personal privacy of a third party) and section 18 (information harmful to individual or public safety) of the *FOIP Act* as grounds for withholding the information in the report.

The Adjudicator hearing the inquiry decided that section 17 did not apply to the records at issue, because all the information in the records was either about the Applicant or about employees of the Public Body acting in representative capacities. Further, she found that section 18 did not apply as the Public Body had not established that there was a reasonable likelihood that harm would result to personal or public safety if the information in the report were disclosed to the Applicant. She ordered the Public Body to give the Applicant access to the records at issue.

On judicial review of Order F2009-026, the Court of Queen's Bench denied the Public Body's application to have the Adjudicator's decision set aside, and confirmed the order of the Adjudicator. The Court held that the Adjudicator's decisions under section 17 and section 18(1)(a) were ones that she could reasonably have come to or that were open to her, given the material that she had to consider, the Public Body's representations and the governing authorities that guided her analysis.

ALBERTA TEACHERS' ASSOCIATION v. ALBERTA (INFORMATION AND PRIVACY COMMISSIONER) – 2011 ABQB 19 – Judicial Review of Decision P2010-D-001

The Alberta Teachers' Association (the "ATA") objected to the Commissioner's ability to carry on with an inquiry into the Complainant's complaint made under *PIPA*. The ATA based it objection on the decision of the Alberta Court of Appeal in Alberta Teachers' Association v. Alberta (Information and Privacy Commissioner), 2010 ABCA 26. The Commissioner issued Decision P2010-D-001, in which he found that the presumption of termination within the terms of the Court of Appeal's decision had not arisen in this case, and that a Notice of Inquiry would issue after the 45-day limitation period had elapsed for bringing a judicial review of his decision.

The ATA sought judicial review of Decision P2010-D-001, seeking to quash the Commissioner's decision to hold an inquiry and to prohibit the Commissioner from conducting an inquiry, on the basis that there was a reasonable apprehension of bias. The ATA also sought a number of declarations relating to the Commissioner and the actions taken by him concerning the Complainant's complaint, including declarations that the Commissioner had fettered his discretion to screen complaints. The ATA further sought mandamus directing the Commissioner to remove quashed decisions from his website, or post them with notices that they had been quashed.

On judicial review, the ATA withdrew those portions of its application dealing with the Court of Appeal's decision, since the Commissioner's appeal of the Court of Appeal's decision to the Supreme Court of Canada was pending. On the issue of the Commissioner's standing, the Court of Queen's Bench granted the Commissioner standing to make submissions, other than submissions about the correctness or reasonableness of his decision.

The Court held that the ATA had failed to establish that the Commissioner had fettered his discretion, that there was any procedural unfairness or that there was a breach of the ATA's reasonable expectations. The ATA was also not entitled to mandamus concerning the Commissioner's website, as the ATA had not established that the Commissioner owed any particular duty with respect to the website or that there was a clear right to performance of any duty relating to the contents of the website.

However, the Court quashed the Commissioner's decision on the ground that there was a reasonable apprehension of bias demonstrated by the Commissioner's comments in his decision. The Court prohibited the Commissioner from taking any further action in relation to the Complainant's complaint, but remitted the matter to the Commissioner to appoint a delegate to deal with all issues arising out of the complaint. The delegate was to initially decide whether the complaint should proceed to inquiry, over the ATA's objections.

HER MAJESTY THE QUEEN IN RIGHT OF ALBERTA, as represented by THE SOLICITOR GENERAL AND MINISTER OF PUBLIC SECURTY v. JASON VAN RASSAL and THE INFORMATION AND PRIVACY COMMISSIONER – Order of Hillier J., issued on November 3, 2010, dismissing the Judicial Review of Decision F2009-D-001, on terms (Court File Number 0903 15963)

The Applicant requested access to records about a cost-benefit study conducted by KPMG, concerning the RCMP's performance as Alberta's contract provincial police force. Alberta Solicitor General and Public Security (the "Public Body") withheld most of the information under section 21(1)(a) (harm to intergovernmental relations), section 24(1)(a), (b) and (c) (advice from officials) and section 25 (harm to economic and other interests of a public body) of the *FOIP Act*.

During the inquiry under the *FOIP Act*, the Public Body submitted submissions and evidence "in camera," so that the submissions and evidence would not be provided to the Applicant. The Adjudicator hearing the inquiry decided that there was no basis for accepting the Public Body's evidence and submissions "in camera," and returned them to the Public Body.

On the Public Body's application for judicial review of Decision F2009-D-001, the Court dismissed the judicial review, on the following terms:

(a) the Applicant (the Public Body) is given leave to resubmit its submissions to the Adjudicator, whether in the form of "in camera" submissions or not or a combination thereof, all such submission to be provided by Friday, November 19, 2010;

(b) the Adjudicator shall issue his or her decision of whether to accept those submissions by Friday, December 17, 2010;

(c) there shall be no judicial review of the decision referred to in (b);

(d) the Adjudicator shall issue his or her final decision in the inquiry by Friday, January 28, 2011;

(e) if the Adjudicator refers to the substance of any portion of "in camera" submissions as provided by the Applicant, in his or her final decision, he or she shall refer to them in "in camera" reasons, those "in camera" reasons only to be provided to the Applicant; and

(f) any judicial review of the Adjudicator's final decision(s), including any "in camera" reasons as described in (e), shall be according to the timeframe provided by s. 74 of the *Freedom of Information and Protection of Privacy Act*, R.S.A., 2000, c. F-25.

ALBERTA (EMPLOYMENT AND IMMIGRATION) v. ALBERTA (INFORMATION AND PRIVACY COMMISSIONER) – 2010 ABCA 304 – Appeal of 2009 ABQB 344 and 2009 ABQB 574, quashing Decision F2008-D-001 and Decision F2008-D-002, and directing that the matter be remitted to a different Adjudicator, respectively

Under the *FOIP Act*, the Applicant made two separate access requests to Alberta Employment and Immigration (the "Public Body") for two employer lists. The first list was the "targeted inspection" program under Workplace Health and Safety. The second list was the "targeted employers" program under employment Standards enforcement. The Public Body denied access to the first list under section 24 (advice) and section 29 (publicly available information) of the *FOIP Act*. The Public Body denied access to the second list under section 24. At the inquiry under the *FOIP Act*, the Public Body raised for the first time in its submission the application of section 20 (law enforcement) of the *FOIP Act* to the "targeted employers" list.

The Adjudicator hearing the inquiry considered that section 16 (business information) and section 17 (personal information) might apply to the two lists. As required by section 67 of the *FOIP Act*, the Adjudicator proposed to immediately notify the employers as affected parties in the inquiry. The Public Body objected. The Adjudicator issued Decision F2008-D-001 and Decision F2008-D-002, in which he decided to notify the employers under section 67.

On judicial review of Decision F2008-D-001 and Decision F2008-D-002, the Public Body argued, and the Court agreed, that the Public Body's application of section 20 and section 24 of the *FOIP Act* meant that the information should not be disclosed to anyone, including the employers, as disclosure of the information would impede government investigations and proper policy decision-making processes.

The Court held that the employers were not to be notified until after the section 20 and section 24 issues were decided, quashed the Adjudicator's decisions to immediately notify the employers and, in a separate decision, removed the Adjudicator for suspicion of bias.

The Commissioner appealed the Court's decision, arguing that the Queen's Bench judge erred in (a) disqualifying the adjudicator; (b) requiring the adjudicator to address section 20 of the *FOIP Act* when the inquiry resumed; (c) finding that section 59(3) of the *FOIP Act* influenced the interpretation and application of section 67(1)(a)(ii) of the *FOIP Act* in this case; and (d) setting a deadline for seeking judicial review.

The Court of Appeal dismissed the appeal. The Court held that a statutory tribunal whose own decision has been quashed by judicial review has no right to appeal unless its own jurisdiction is in question, and that the first three grounds of appeal did not raise jurisdictional issues. While the fourth ground of appeal may raise a jurisdictional question, on that ground the Queen's Bench judge was correct.

REAL ESTATE COUNCIL OF ALBERTA v. ALBERTA (INFORMATION AND PRIVACY COMMISSIONER) – 2010 ABQB 598 – Judicial Review of Order P2009-004

The Complainant made a complaint under *PIPA* that the Real Estate Council of Alberta (the "Organization") was collecting personal information about pardoned convictions through its brokerage licence application forms. The Organization argued that it did not use information about pardoned convictions in making decisions about issuing brokerage licences and also took the position that there was no evidence that it had collected this kind of information.

The Adjudicator hearing the inquiry determined that it was likely that the Organization had collected personal information about pardoned convictions, given the wording of its forms. She found that the Organization had a reasonable purpose for collecting this personal information under section 11(1) of *PIPA*, given its statutory duties. However, she found that, in the circumstances, the Organization was collecting more information than was necessary for meeting the purposes for which it collected the information, given its evidence that it did not use information about pardoned convictions to make licencing decisions. The Adjudicator ordered the Organization to comply with section 11(2) of *PIPA* by ensuring that it did not collect more personal information through its licencing forms than is reasonable for making decisions about licencing.

On judicial review of Order P2009-004, the Court of Queen's Bench dismissed the application. The Adjudicator had decided that the evidence before her supported the conclusion that the Organization had collected information concerning pardoned convictions. The Court held that the Adjudicator's decision was reasonable and was entitled to judicial deference. The Court also found to be without merit the Organization's attacks on the Adjudicator's decision on the basis of alleged breaches of fairness and natural justice.

In particular, the Court rejected the Organization's submission that the Adjudicator did not provide the Organization with an opportunity to comment on the remedy ordered under *PIPA*. The Court held that the order the Adjudicator made was one that section 52 of *PIPA* contemplated. The Organization must be taken to have known the possible remedies that could flow in the inquiry, as they are set out under *PIPA*. In its submissions to the Adjudicator, it said nothing about remedy. The Court held that it does not constitute a beach of natural justice for the Adjudicator to make a disposition that is clearly contemplated by the empowering legislation without seeking input from the parties beyond what they have chosen to say in their submissions.

STATISTICAL INFORMATION

Table 1: Cases Opened 2010-11 Fiscal Year *FOIP, HIA,* and *PIPA*

STATISTICS ARE FROM THE PERIOD APRIL 1, 2010 TO MARCH 31, 2011

Case Type	FOIP	HIA	PIPA
Advice and Direction	2	0	0
Authorization to Disregard a Request	6	0	1
Complaint	107	26	138
Comment on Programs	0	0	0
Excuse Fees	9	0	1
Investigation Generated by Commissioner	14	17	2
Offense Investigation	0	17	0
Privacy Impact Assessments	20	510	0
Request for Information	43	65	1
Request for Review	132	31	73
Request for Review Third Party	17	0	0
Request Time Extension	31	0	1
Self-reported Breach	16	43	49
Total	**397**	**709**	**266**

Please refer to **Appendix A** for a complete listing of the cases opened in the 2010-11 fiscal year.

Note: Only *FOIP* allows a Third Party to request a review of a Public Body's decision to release Third Party information to an applicant.

Table 2: Cases Closed 2010-11 Fiscal Year *FOIP, HIA,* and *PIPA*

STATISTICS ARE FROM THE PERIOD APRIL 1, 2010 TO MARCH 31, 2011

Case Type	*FOIP*	*HIA*	*PIPA*
Advice and Direction	2	0	0
Authorization to Disregard a Request	6	0	1
Complaint	114	19	150
Comment on Programs	0	0	0
Excuse Fees	9	1	2
Investigation Generated by Commissioner	11	16	5
Offense Investigation	0	1	1
Privacy Impact Assessments	20	501	0
Request for Information	41	60	6
Request for Review	155	27	67
Request for Review Third Party	15	0	0
Request Time Extension	27	0	1
Self-reported Breach	14	44	37
Total	**414**	**669**	**270**

Please refer to **Appendix D** for a complete listing of the PIAs accepted by the Commissioner in the fiscal year 2010-11. Please refer to **Appendix B** for a listing of cases closed by public body, custodian and organization type.

Graph 1: Total Number of Cases Opened – A Two Year Comparison

STATISTICS ARE FROM THE PERIOD APRIL 1, 2010 TO MARCH 31, 2011

	Advice and Direction	Authorization to Disregard Request	Complaint	Comment on Programs	Excuse Fees	Investigation Generated by Commissioner	Offense Investigation	Privacy Impact Assessments	Request for Information	Request for Review	Request for Review Third Party	Request Time Extension	Self-reported Breach	Total
FOIP Cases Opened 2011	2	6	107	0	9	14	0	20	43	132	17	31	16	397
FOIP Cases Opened 2010	2	3	88	0	5	14	0	33	42	176	20	30	17	430
HIA Cases Opened 2011	0	0	26	0	0	17	17	510	65	31	0	0	43	709
HIA Cases Opened 2010	0	1	26	1	1	15	1	680	54	33	0	0	47	859
PIPA Cases Opened 2011	0	1	138	0	1	2	0	0	1	73	0	1	49	266
PIPA Cases Opened 2010	0	1	188	0	4	4	1	1	12	64	0	0	15	290

Graph 2: Total Number of Cases Closed – A Two Year Comparison

STATISTICS ARE FROM THE PERIOD APRIL 1, 2010 TO MARCH 31, 2011.

	Advice and Direction	Authorization to Disregard Request	Complaint	Comment on Programs	Excuse Fees	Investigation Generated by Commissioner	Offense Investigation	Privacy Impact Assessments	Request for Information	Request for Review	Request for Review Third Party	Request Time Extension	Self-reported Breach	Total
FOIP Cases Closed 2011	2	6	114	0	9	11	0	20	41	155	15	27	14	**414**
FOIP Cases Closed 2010	4	3	107	0	6	12	0	31	42	192	26	30	22	**475**
HIA Cases Closed 2011	0	0	19	0	1	16	1	501	60	27	0	0	44	**669**
HIA Cases Closed 2010	0	1	20	1	0	15	1	710	51	33	0	0	53	**885**
PIPA Cases Closed 2011	0	1	150	0	2	5	1	0	6	67	0	1	37	**270**
PIPA Cases Closed 2010	0	1	176	0	2	4	0	1	8	58	0	0	17	**267**

Table 3: Cases Opened by Public Bodies, Custodians, Organizations Subject to the Legislation, and Commissioner on Own Motion

STATISTICS ARE FROM THE PERIOD APRIL 1, 2010 TO MARCH 31, 2011

	Number of Cases	Percentage
FOIP		
Investigation Generated by Commissioner	14	3%
Public Bodies	118	30%
*Public	265	67%
Total	**397**	**100%**
HIA		
Investigation Generated by Commissioner	17	2%
Custodian	635	90%
*Public	57	8%
Total	**709**	**100%**
PIPA		
Investigation Generated by Commissioner	2	1%
Organization	53	19%
*Public	211	80%
Total	**266**	**100%**

*Includes individuals, media, agents, third party agents, agent applicants, MLAs, companies, others, special interest groups.

Table 4: Percentage of Cases Closed by Resolution Method

STATISTICS ARE FROM THE PERIOD APRIL 1, 2010 TO MARCH 31, 2011

Resolution Method	Number of Cases *(FOIP)*	Number of Cases *(HIA)*	Number of Cases *(PIPA)*	Total	Percentage
Resolved by Mediation/Investigation	230	41	172	443	79%
Resolved by Order	42	3	24	69	12%
Resolved by Commissioner's Decision to Refuse to Conduct an Inquiry	21	3	24	48	9%
Total	**293**	**47**	**220**	**560**	**100%**

***FOIP* Orders:** **38 (42 cases)**

***HIA* Orders:** **3 (3 cases)**

***PIPA* Orders:** **23 (24 cases)**

Notes: Some Orders and/or Report Numbers were assigned to more than one case. Some cases had more than one Order.

Orders are recorded by the date the Order was signed, rather than the date the Order was publicly released.

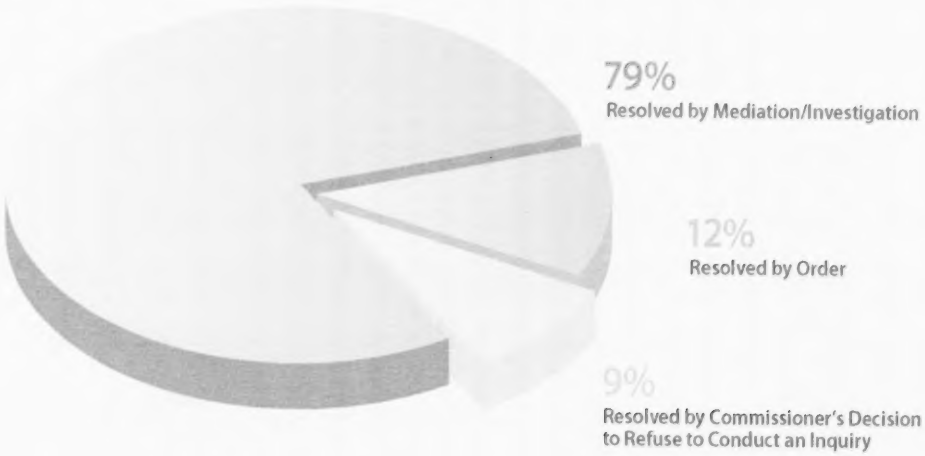
Under the legislation, only certain case types can proceed to inquiry if the matters are not resolved at mediation/investigation. The above statistics are those case types that can proceed to inquiry (Request for Review, Request for Review Third Party, Request to Excuse Fees and Complaint files).

This table only includes Orders issued that concluded/closed the file. See **Appendix C** for a listing of all Orders issued.

Please refer to **Tables 1** and **2** and Appendices **A** and **B** for total cases opened and closed.

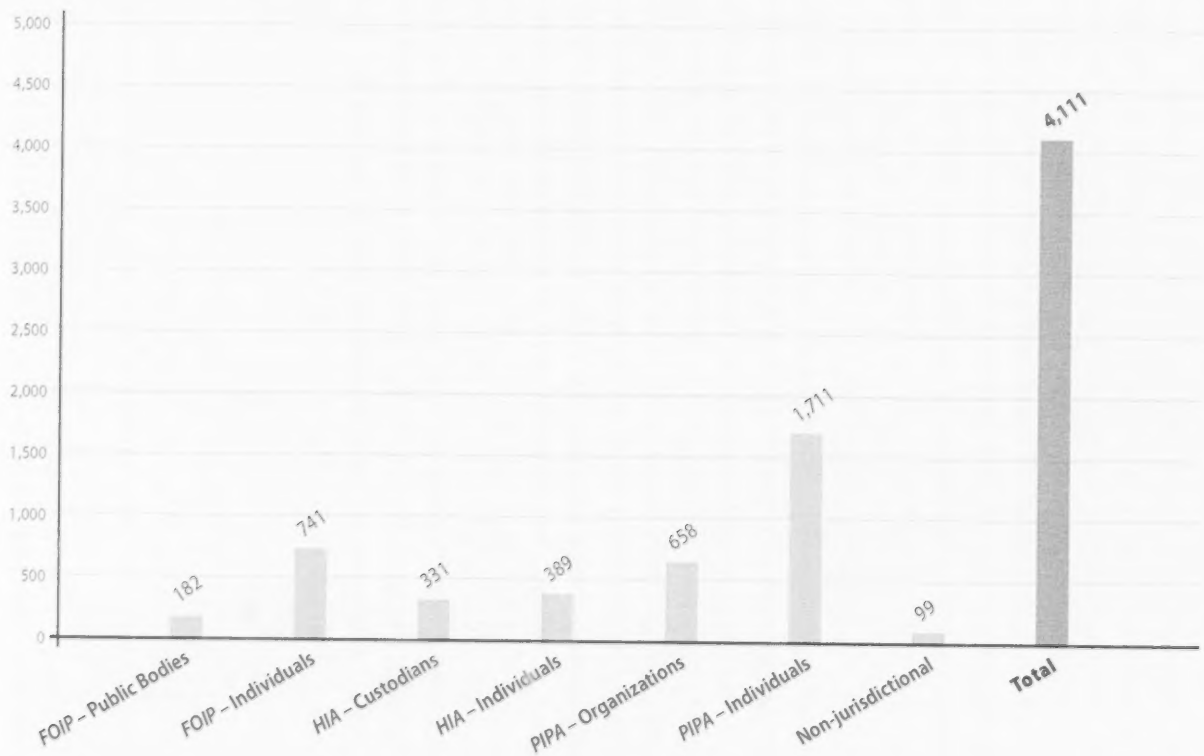
A copy of all Orders and Investigation Reports are available on the Office's web site **www.oipc.ab.ca**

Graph 3: Percentage of Cases Closed by Resolution Method



Graph 4: *FOIP, HIA,* and *PIPA* Non-case Related Calls, Emails, and Written Enquiries

STATISTICS ARE FROM THE PERIOD APRIL 1, 2010 TO MARCH 31, 2011



FINANCIAL STATEMENTS

For the Year Ended March 31, 2011

CONTENTS

42 Independent Auditor's Report

43 Statement of Operations

44 Statement of Financial Position

45 Statement of Cash Flows

46 Notes to the Financial Statements

51 Schedule 1 – Salary and Benefits Disclosure

52 Schedule 2 – Allocated Costs

INDEPENDENT AUDITOR'S REPORT

AUDITOR GENERAL *Alberta*

To the Members of the Legislative Assembly

Report on the Financial Statements

I have audited the accompanying financial statements of the Office of the Information and Privacy Commissioner, which comprise the statement of financial position as at March 31, 2011, and the statements of operations, and cash flows for the year then ended, and a summary of significant accounting policies and other explanatory information.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with Canadian public sector accounting standards, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

My responsibility is to express an opinion on these financial statements based on my audit. I conducted my audit in accordance with Canadian generally accepted auditing standards. Those standards require that I comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my audit opinion.

Opinion

In my opinion, the financial statements present fairly, in all material respects, the financial position of the Office of the Information and Privacy Commissioner as at March 31, 2011, and the results of its operations and its cash flows for the year then ended in accordance with Canadian public sector accounting standards.

[Original signed by Merwan N. Saher, CA]

Auditor General

July 19, 2011

Edmonton, Alberta

Office of the Information and Privacy Commissioner
Statement of Operations
Year ended March 31, 2011

	2011		2010
	Budget	Actual	Actual
Revenues			
Prior Year Expenditure Refund	$ -	$ 11	$ 4,198
Other Revenue	-	631	522
	-	642	4,720
Expenses – Directly Incurred (Note 3b)			
Voted			
Salaries, Wages, and Employee Benefits	$ 4,484,000	$ 4,461,751	$ 4,099,172
Supplies and Services	1,150,000	988,188	1,063,150
Amortization of Tangible Capital Assets	32,000	36,501	26,527
Total Voted Expenses before Recoveries	5,666,000	5,486,440	5,188,849
Less: Recovery from Support Service Arrangements with Related Parties (Note 7)	-	-	(18,750)
	5,666,000	5,486,440	5,170,099
Statutory			
Valuation Adjustments			
Provision for Vacation Pay	-	(32,456)	79,047
	5,666,000	5,453,984	5,249,146
Loss on Disposal of Capital Assets	-	(6,125)	(379)
Net Operating Results	$ (5,666,000)	$ (5,459,467)	$ (5,244,805)

The accompanying notes and schedules are part of these financial statements.

Office of the Information and Privacy Commissioner
Statement of Financial Position
As at March 31, 2011

	2011	2010
Assets		
Cash	$ 100	$ 100
Accounts Receivable	1,405	1,323
Prepaid Expenses	4,061	7,291
Tangible Capital Assets (Note 4)	185,773	134,450
	$ 191,339	$ 143,164
Liabilities		
Accounts Payable and Accrued Liabilities	$ 339,274	$ 299,702
Accrued Vacation Pay	394,214	426,670
	733,488	726,372
Net Liabilities		
Net Liabilities at Beginning of Year	(583,208)	(649,209)
Net Operating Results	(5,459,467)	(5,244,805)
Net Financing Provided from General Revenues	5,500,526	5,310,806
	(542,149)	(583,208)
	$ 191,339	$ 143,164

The accompanying notes and schedules are part of these financial statements.

Office of the Information and Privacy Commissioner
Statement of Cash Flows
Year ended March 31, 2011

	2011	2010
Operating Transactions		
Net Operating Results	$ (5,459,467)	$ (5,244,805)
Non-cash Items Included in Net Operating Results		
Amortization of Tangible Capital Assets	36,501	26,527
Valuation Adjustments	(32,456)	79,047
Loss on Disposal of Tangible Capital Assets	6,125	379
	(5,449,297)	(5,138,852)
(Increase) Decrease in Accounts Receivable	(82)	1,177
Decrease (Increase) in Prepaid Expenses	3,230	(3,554)
Increase (Decrease) in Accounts Payable	39,572	(94,160)
Cash Applied to Operating Transactions	(5,406,577)	(5,235,389)
Capital Transactions		
Disposal of Tangible Capital Assets	-	272
Acquisition of Tangible Capital Assets	(93,949)	(75,689)
Cash Applied to Capital Transactions	(93,949)	(75,417)
Financing Transactions		
Net Financing Provided From General Revenues	5,500,526	5,310,806
Cash, Beginning of Year	100	100
Cash, End of Year	$ 100	$ 100

The accompanying notes and schedules are part of these financial statements.

Office of the Information and Privacy Commissioner
Notes to the Financial Statements
Year ended March 31, 2011

Note 1 Authority

The Office of the Information and Privacy Commissioner (the Office) operates under the authority of the *Freedom of Information and Protection of Privacy Act*. The net cost of the operations of the Office is borne by the General Revenue Fund of the Province of Alberta. Annual operating budgets are approved by the Standing Committee on Legislative Offices.

Note 2 Purpose

The Office of the Information and Privacy Commissioner provides oversight on the following legislation governing access to information and protection of privacy:

Freedom of Information and Protection of Privacy Act
Health Information Act
Personal Information Protection Act

The major operational purposes of the Office of the Information and Privacy Commissioner are:

- To provide independent reviews of decisions made by public bodies, custodians and organizations and provide resolution of complaints under the Acts;
- To advocate protection of privacy for Albertans; and
- To promote openness and accountability for Alberta public bodies.

Note 3 Summary of Significant Accounting Policies and Reporting Practices

These financial statements are prepared in accordance with Canadian public sector accounting standards.

a) Reporting Entity

The reporting entity is the Office of the Information and Privacy Commissioner (the Office), for which the Information and Privacy Commissioner is responsible.

Note 3 Summary of Significant Accounting Policies and Reporting Practices (continued)

a) Reporting Entity (continued)

The Office operates within the General Revenue Fund (the Fund). The Fund is administered by the Minister of Finance and Enterprise. All cash receipts of the Office are deposited into the Fund and all cash disbursements made by the Office are paid from the Fund. Net Financing provided from General Revenues is the difference between all cash receipts and all cash disbursements made.

b) Basis of Financial Reporting

Revenues

All revenues are reported on the accrual basis of accounting.

Expenses

Directly Incurred

Directly incurred expenses are those costs the Office has primary responsibility and accountability for, as reflected in the Office's budget documents.

In addition to program operating expenses such as salaries, supplies, etc., directly incurred expenses also include:

- Amortization of tangible capital assets;
- Pension costs, which are the cost of employer contributions for current service of employees during the year; and
- Valuation adjustments which represent the change in management's estimate of future payments arising from obligations relating to vacation pay.

Incurred by Others

Services contributed by other entities in support of the Office's operations are not recognized and are disclosed in Schedule 2.

Note 3 Summary of Significant Accounting Policies and Reporting Practices (continued)

b) Basis of Financial Reporting (continued)

Assets

Financial assets are assets that could be used to discharge existing liabilities or finance future operations and are not for consumption in the normal course of operations. Financial assets of the Office are limited to financial claims, such as receivables from other organizations.

Tangible capital assets of the Office are recorded at historical cost and are amortized on a straight-line basis over the estimated useful lives of the assets. The threshold for tangible capital assets is $5,000.

Liabilities

Liabilities are recorded to the extent that they represent present obligations as a result of events and transactions occurring prior to the end of the fiscal year. The settlement of liabilities will result in sacrifice of economic benefits in the future.

Net Liabilities

Net liabilities represents the difference between the carrying value of assets held by the Office and its liabilities.

Valuation of Financial Assets and Liabilities

Fair value is the amount of consideration agreed upon in an arm's length transaction between knowledgeable, willing parties who are under no compulsion to act.

The fair values of cash, accounts receivable, accounts payable and accrued liabilities are estimated to approximate their carrying values because of the short term nature of these instruments.

Note 4 Tangible Capital Assets

	Office equipment and furniture	Computer hardware and software	2011 Total	2010 Total
Estimated Useful Life	10 years	3-5 years		
Historical Cost				
Beginning of Year	$ 281,043	$ 187,721	$ 468,764	$ 436,389
Additions	9,939	84,010	93,949	75,689
Disposals, Including Write-Downs	(21,865)	(5,243)	(27,108)	(43,314)
	$ 269,117	$ 266,488	$ 535,605	$ 468,764
Accumulated Amortization				
Beginning of Year	$ 226,685	$ 107,629	$ 334,314	$ 350,450
Amortization Expense	16,822	19,679	36,501	26,527
Effect of Disposals	(15,740)	(5,243)	(20,983)	(42,663)
	$ 227,767	$ 122,065	$ 349,832	$ 334,314
Net Book Value at March 31, 2011	$ 41,350	$ 144,423	$ 185,773	
Net Book Value at March 31, 2010	$ 54,358	$ 80,092		$ 134,450

Note 5 Defined Benefit Plans

The Office participates in the multiemployer Management Employees Pension Plan and Public Service Pension Plan. The Office also participates in the multiemployer Supplementary Retirement Plan for Public Service Managers. The expense for these pension plans is equivalent to the annual contributions of $502,295 for the year ended March 31, 2011 (2010 – $497,304).

At December 31, 2010, the Management Employees Pension Plan reported a deficiency of $397,087,000 (2009 – deficiency $483,199,000) and the Public Service Pension Plan reported a deficiency of $2,067,151,000 (2009 – deficiency $1,729,196,000). At December 31, 2010, the Supplementary Retirement Plan for Public Service Managers had a deficiency of $39,559,000 (2009 – deficiency $39,516,000).

The Office also participates in a multiemployer Long Term Disability Income Continuance Plan. At March 31, 2011, the Management, Opted Out and Excluded Plan reported an actuarial surplus of $7,020,000 (2009 – surplus $7,431,000). The expense for this plan is limited to employer's annual contributions for the year.

Note 6 Contractual Obligations

Contractual obligations are obligations of the Office to others that will become liabilities in the future when the terms of contracts or agreements are met.

	2011	2010
Obligations under operating leases and contracts	$ 56,963	$ 73,721

Estimated payment requirements for each of the next three years are as follows:

	Total
2011-12	$ 38,423
2012-13	17,415
2013-14	1,125
	$ 56,963

Note 7 Related Party Transactions

Until December 31, 2009, the Office of the Information and Privacy Commissioner provided financial services to the Office of the Ethics Commissioner. Recovery from Support Service Arrangements with Related Parties in the amount of $18,750 is disclosed as a recovery of expenses for the year ended March 31, 2010.

Note 8 Comparative Figures

Certain 2010 figures have been reclassified to conform to the 2011 presentation.

Note 9 Approval of Financial Statements

These financial statements were approved by the Information and Privacy Commissioner.

Schedule 1

Office of the Information and Privacy Commissioner
Salary and Benefits Disclosure
Year ended March 31, 2011

	2011				2010
	Base Salary [a]	Other Cash Benefits [b]	Other Non-cash Benefits [c]	Total	Total
Senior Official					
Information and Privacy Commissioner [d]	$ 238,932	$ 1,750	$ 62,603	$ 303,285	$ 304,169

Prepared in accordance with Treasury Board Directive 12/98 as amended.

[a] Base salary includes pensionable base pay.

[b] Other cash benefits include vacation payouts and lump sum payments. There were no bonuses paid in 2011.

[c] Other non-cash benefits include the government's share of all employee benefits and contributions or payments made on behalf of employee, including pension, supplementary retirement plan, health care, dental coverage, group life insurance, short and long term disability plans, professional memberships and tuition fees.

[d] Automobile provided, no dollar amount included in other non-cash benefits.

Schedule 2

Office of the Information and Privacy Commissioner
Allocated Costs
Year ended March 31, 2011

	2011					2010
		Expenses - Incurred by Others		Valuation Adjustments [d]		
Program	Expenses[a]	Accommodation Costs[b]	Telephone Costs[c]	Vacation Pay	Total Expenses	Total Expenses
Operations	$ 5,486,440	$ 383,188	$ 14,816	$ (32,456)	$ 5,851,988	$ 5,661,929

[a] Expenses - Directly Incurred as per Statement of Operations, excluding valuation adjustments.
[b] Costs shown for Accommodation (includes grants in lieu of taxes), allocated by square footage.
[c] Telephone Costs is the line charge for all phone numbers.
[d] Valuation Adjustments as per Statement of Operations.

APPENDICES

Appendix A: Cases Opened 2010-11 Fiscal Year by Public Body, Custodian and Organization Type

STATISTICS ARE FROM THE PERIOD APRIL 1, 2010 TO MARCH 31, 2011

FOIP Public Body Type	Advice and Direction	Authorization to Disregard Request	Complaint	Comment on Programs	Excuse Fees	Investigation Generated by Commissioner	Offense Investigation	Privacy Impact Assessments	Request for Information	Request for Review	Request for Review Third Party	Request Time Extension	Self-reported Breach	Total
Agencies	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Boards	0	0	13	0	1	2	0	0	1	5	1	4	0	27
Child and Family Service Authorities	0	0	4	0	0	1	0	0	0	6	0	9	0	20
Colleges	0	0	2	0	0	1	0	0	2	0	0	0	1	6
Commissions	0	1	1	0	0	1	0	0	0	3	1	0	0	7
Committees	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Crown Corporations	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Foundations	0	0	1	0	0	0	0	0	1	0	0	0	0	2
Government Ministries/ Departments	0	2	45	0	4	7	0	10	23	45	6	14	6	162
Law Enforcement Agencies	0	1	7	0	1	0	0	0	0	22	0	1	1	33
Legislative Assembly Office	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Local Government Bodies	0	0	1	0	0	0	0	0	0	0	0	0	1	2
Municipalities	2	2	19	0	2	1	0	3	5	28	8	1	1	72
Nursing Homes	0	0	1	0	0	0	0	0	1	0	0	0	0	2
Officers of the Legislature	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Premier's Office	0	0	0	0	0	0	0	0	0	2	0	0	0	2
Regional Health Authorities (Alberta Health Services)	0	0	2	0	0	0	0	2	1	7	1	0	1	14
School Districts	0	0	7	0	0	0	0	2	5	5	0	2	3	24
Universities	0	0	4	0	1	1	0	3	3	4	0	0	2	18
*Other Public Bodies	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Total	**2**	**6**	**107**	**0**	**9**	**14**	**0**	**20**	**43**	**132**	**17**	**31**	**16**	**397**

* Public Body types identified as "Other" category include: Parties contracted by Alberta Treasury Branch.

	Advice and Direction	Authorization to Disregard Request	Complaint	Comment on Programs	Excuse Fees	Investigation Generated by Commissioner	Offense Investigation	Privacy Impact Assessments	Request for Information	Request for Review	Request for Review Third Party	Request Time Extension	Self-reported Breach	Total
***HIA* Custodian Type**														
Alberta Health and Wellness	0	0	2	0	0	0	0	21	8	2	0	0	3	**36**
Boards, Councils, Committees, Panels, or Agencies created by Custodians	0	0	0	0	0	0	0	0	2	1	0	0	0	**3**
Dentists	0	0	1	0	0	0	0	0	0	0	0	0	0	**1**
Dental Hygienists	0	0	0	0	0	0	0	0	1	0	0	0	0	**1**
Nursing Homes	0	0	1	0	0	4	0	4	2	0	0	0	5	**16**
Pharmacies/Pharmacists	0	0	7	0	0	3	1	52	1	0	0	0	1	**65**
Physicians	0	0	6	0	0	3	13	361	15	10	0	0	14	**422**
Provincial Health Boards	0	0	0	0	0	0	0	0	1	0	0	0	0	**1**
Registered Nurses	0	0	0	0	0	0	1	0	2	0	0	0	0	**3**
Regional Health Authorities (Alberta Health Services)	0	0	9	0	0	7	2	36	5	17	0	0	17	**93**
Subsidiary Health Corporations	0	0	0	0	0	0	0	3	0	0	0	0	0	**3**
***HIA* Non-custodian Type**														
Affiliates and Information Managers (Electronic Medical Record Vendors/Physician Office System Program Consultants)	0	0	0	0	0	0	0	10	7	0	0	0	0	**17**
Faculties of Medicine	0	0	0	0	0	0	0	0	1	0	0	0	1	**2**
Health Professional Colleges and Associations	0	0	0	0	0	0	0	0	15	0	0	0	0	**15**
*Primary Care Networks	0	0	0	0	0	0	0	23	4	1	0	0	2	**30**
Other	0	0	0	0	0	0	0	0	1	0	0	0	0	**1**
Total	**0**	**0**	**26**	**0**	**0**	**17**	**17**	**510**	**65**	**31**	**0**	**0**	**43**	**709**

* Primary Care Networks are formed on the basis of an agreement between custodians: a group of physicians located within a given geographic area, Alberta Health Services, and Alberta Health and Wellness. However, the resulting Primary Care Network organizations are not custodians.

PIPA Organization Type	Advice and Direction	Authorization to Disregard Request	Complaint	Comment on Programs	Excuse Fees	Investigation Generated by Commissioner	Offense Investigation	Privacy Impact Assessments	Request for Information	Request for Review	Request for Review Third Party	Request Time Extension	Self-reported Breach	Total
Accommodation & Food Services	0	0	9	0	0	0	0	0	0	1	0	0	1	**11**
Administration & Support Services	0	0	6	0	0	0	0	0	0	2	0	0	1	**9**
Construction	0	0	4	0	0	0	0	0	0	6	0	1	0	**11**
Educational Services	0	0	0	0	0	0	0	0	0	1	0	0	0	**1**
Finance	0	0	6	0	0	0	0	0	1	7	0	0	15	**29**
Private Healthcare & Social Assistance	0	0	10	0	0	0	0	0	0	10	0	0	8	**28**
Information & Cultural Industries	0	0	3	0	0	0	0	0	0	0	0	0	0	**3**
Insurance Industry	0	0	6	0	0	0	0	0	0	1	0	0	2	**9**
Manufacturing	0	0	4	0	1	0	0	0	0	6	0	0	2	**13**
Mining, Oil & Gas	0	0	8	0	0	0	0	0	0	7	0	0	2	**17**
Professional, Scientific & Technical	0	0	11	0	0	0	0	0	0	8	0	0	3	**22**
Public Administration	0	0	1	0	0	0	0	0	0	0	0	0	0	**1**
Real Estate, Rental & Leasing	0	0	17	0	0	1	0	0	0	3	0	0	2	**23**
Retail	0	0	22	0	0	0	0	0	0	2	0	0	3	**27**
Transportation	0	0	2	0	0	0	0	0	0	2	0	0	0	**4**
Utilities	0	0	3	0	0	0	0	0	0	2	0	0	1	**6**
Wholesale Trade	0	0	4	0	0	0	0	0	0	1	0	0	0	**5**
Arts, Entertainment & Recreation	0	0	3	0	0	0	0	0	0	1	0	0	1	**5**
*Other Services	0	1	19	0	0	1	0	0	0	13	0	0	8	**42**
Total	**0**	**1**	**138**	**0**	**1**	**2**	**0**	**0**	**1**	**73**	**0**	**1**	**49**	**266**

* Other Services include repair, personal care, beauty shops, unions, parking lots, religious organizations, business associations, political organizations, professional regulatory organizations, courier services, agricultural companies and condo boards.

Appendix B: Cases Closed 2010-11 Fiscal Year by Public Body, Custodian and Organization Type

STATISTICS ARE FROM THE PERIOD APRIL 1, 2010 TO MARCH 31, 2011

FOIP Public Body Type	Advice and Direction	Authorization to Disregard Request	Complaint	Comment on Programs	Excuse Fees	Investigation Generated by Commissioner	Offense Investigation	Privacy Impact Assessments	Request for Information	Request for Review	Request for Review Third Party	Request Time Extension	Self-reported Breach	Total
Agencies	0	0	0	0	0	0	0	0	0	1	0	0	0	**1**
Boards	0	1	11	0	0	1	0	0	1	11	0	4	0	**29**
Child and Family Service Authorities	0	0	6	0	0	0	0	0	0	4	0	9	0	**19**
Colleges	0	0	2	0	0	0	0	0	2	0	0	0	1	**5**
Commissions	0	0	1	0	0	0	0	0	0	7	0	0	0	**8**
Committees	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Crown Corporations	0	0	1	0	0	0	0	0	0	2	0	0	0	**3**
Foundations	0	0	1	0	0	0	0	0	1	0	0	0	0	**2**
Government Ministries/ Departments	0	2	45	0	3	4	0	12	22	44	5	10	6	**153**
Law Enforcement Agencies	0	2	7	0	1	0	0	0	0	27	0	1	1	**39**
Legislative Assembly Office	0	0	0	0	0	0	0	0	1	0	0	0	0	**1**
Local Government Bodies	0	0	1	0	0	1	0	0	0	0	0	0	1	**3**
Metis Settlements	0	0	1	0	0	0	0	0	0	0	0	0	0	**1**
Municipalities	2	1	17	0	4	2	0	4	6	37	9	1	1	**84**
Nursing Homes	0	0	1	0	0	0	0	0	1	2	0	0	0	**4**
Officers of the Legislature	0	0	0	0	0	0	0	0	0	1	0	0	0	**1**
Premier's Office	0	0	0	0	0	0	0	0	0	1	0	0	0	**1**
Regional Health Authorities (Alberta Health Services)	0	0	5	0	0	1	0	2	1	9	1	0	0	**19**
School Districts	0	0	7	0	0	1	0	1	4	3	0	2	2	**20**
Universities	0	0	8	0	1	1	0	1	2	6	0	0	2	**21**
*Other Public Bodies	0	0	0	0	0	0	0	0	0	1	0	0	0	**1**
Total	**2**	**6**	**114**	**0**	**9**	**11**	**0**	**20**	**41**	**155**	**15**	**27**	**14**	**414**

* Public Body types identified as "Other" category include: Parties contracted by a Alberta Treasury Branch.

	Advice and Direction	Authorization to Disregard Request	Complaint	Comment on Programs	Excuse Fees	Investigation Generated by Commissioner	Offense Investigation	Privacy Impact Assessments	Request for Information	Request for Review	Request for Review Third Party	Request Time Extension	Self-reported Breach	Total
***HIA* Custodian Type**														
Alberta Health and Wellness	0	0	2	0	0	1	0	17	6	2	0	0	4	**32**
Boards, Councils, Committees, Panels, or Agencies created by Custodians	0	0	0	0	0	0	0	0	9	0	0	0	0	**9**
Dental Hygienists	0	0	0	0	0	0	0	0	1	0	0	0	0	**1**
Nursing Homes	0	0	0	0	0	1	0	6	1	0	0	0	4	**12**
Pharmacies/Pharmacists	0	0	5	0	0	2	0	53	1	1	0	0	3	**65**
Physicians	0	0	2	0	1	2	0	354	17	8	0	0	13	**397**
Provincial Health Boards	0	0	0	0	0	0	0	3	1	0	0	0	0	**4**
Registered Nurses	0	0	0	0	0	0	0	0	1	0	0	0	0	**1**
Regional Health Authorities (Alberta Health Services)	0	0	10	0	0	10	1	36	6	16	0	0	19	**98**
***HIA* Non-custodian Type**														
Affiliates and Information Managers (Electronic Medical Record Vendors/Physician Office System Program, Consultants)	0	0	0	0	0	0	0	7	9	0	0	0	0	**16**
Faculties of Medicine	0	0	0	0	0	0	0	0	1	0	0	0	0	**1**
Health Professional Colleges and Associations	0	0	0	0	0	0	0	0	4	0	0	0	0	**4**
*Primary Care Networks	0	0	0	0	0	0	0	21	3	0	0	0	1	**25**
Subsidiary Health Corporations	0	0	0	0	0	0	0	4	0	0	0	0	0	**4**
Total	**0**	**0**	**19**	**0**	**1**	**16**	**1**	**501**	**60**	**27**	**0**	**0**	**44**	**669**

* Primary Care Networks are formed on the basis of an agreement between custodians: a group of physicians located within a given geographic area, Alberta Health Services, and Alberta Health and Wellness. However, the resulting Primary Care Network organizations are not custodians.

PIPA Organization Type	Advice and Direction	Authorization to Disregard Request	Complaint	Comment on Programs	Excuse Fees	Investigation Generated by Commissioner	Offense Investigation	Privacy Impact Assessments	Request for Information	Request for Review	Request for Review Third Party	Request Time Extension	Self-reported Breach	Total
Accommodation & Food Services	0	0	11	0	0	0	1	0	0	3	0	0	1	**16**
Administration & Support Services	0	0	4	0	0	0	0	0	0	0	0	0	0	**4**
Construction	0	0	1	0	0	0	0	0	0	8	0	1	0	**10**
Educational Services	0	0	1	0	0	0	0	0	1	1	0	0	0	**3**
Finance	0	1	10	0	0	0	0	0	0	2	0	0	8	**21**
Private Healthcare & Social Assistance	0	0	11	0	1	1	0	0	0	9	0	0	7	**29**
Information & Cultural Industries	0	0	5	0	0	0	0	0	0	0	0	0	1	**6**
Insurance Industry	0	0	6	0	0	0	0	0	0	5	0	0	2	**13**
Manufacturing	0	0	1	0	0	0	0	0	0	7	0	0	0	**8**
Mining, Oil & Gas	0	0	17	0	0	0	0	0	1	2	0	0	0	**20**
Professional, Scientific & Technical	0	0	16	0	0	2	0	0	0	7	0	0	0	**25**
Public Administration	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Real Estate, Rental & Leasing	0	0	15	0	0	1	0	0	0	2	0	0	2	**20**
Retail	0	0	15	0	0	0	0	0	0	4	0	0	2	**21**
Transportation	0	0	4	0	0	0	0	0	0	0	0	0	0	**4**
Utilities	0	0	2	0	0	0	0	0	0	1	0	0	1	**4**
Wholesale Trade	0	0	2	0	0	0	0	0	0	1	0	0	0	**3**
Arts, Entertainment & Recreation	0	0	3	0	0	0	0	0	0	1	0	0	1	**5**
*Other Services	0	0	26	0	1	1	0	0	4	14	0	0	12	**59**
Total	**0**	**1**	**150**	**0**	**2**	**5**	**1**	**0**	**6**	**67**	**0**	**1**	**37**	**270**

* Other Services include repair, personal care, beauty shops, unions, parking lots, religious organizations, business associations, political organizations, professional regulatory organizations, courier services, agricultural companies and condo boards.

Appendix C: Orders and Public Investigation Reports Issued

STATISTICS ARE FROM THE PERIOD APRIL 1, 2010 TO MARCH 31, 2011

FOIP Respondent	Orders	Decisions	Public Investigation Reports	Total
Agriculture Financial Services Corporation	1	0	0	1
Alberta Advanced Education and Technology	1	0	0	1
Alberta Employment & Immigration	3	0	0	3
Alberta Environment	1	0	0	1
Alberta Gaming and Liquor Commission	1	0	0	1
Alberta Health and Wellness	1	0	0	1
Alberta Health Services	1	0	0	1
Alberta Justice & Attorney General	1	0	1	2
Alberta Solicitor General & Public Security	1	0	0	1
Alberta Transportation	1	0	0	1
Alberta Transportation Safety Board	1	0	0	1
Board of Trustees of Edmonton School District	1	0	0	1
Calgary and Area Child and Family Services Authority (CFSA)	1	0	0	1
Calgary Board of Education	1	0	0	1
Calgary Police Service	2	1	0	3
City of Calgary	1	0	0	1
City of Edmonton	1	0	0	1
County of Thorhild No. 7	1	0	0	1
County of Vermilion River No. 24	1	0	0	1
Edmonton and Area Child and Family Services Authority (Region 6)	1	0	0	1
Edmonton Police Commission	1	0	0	1
Edmonton Police Service	8	1	0	9
Town of Bruderheim	1	0	0	1
University of Calgary	3	0	0	3
Workers' Compensation Board	2	0	0	2
Sub-Total	**38**	**2**	**1**	**41**

HIA Respondent	Orders	Decisions	Public Investigation Reports	Total
Regional Health Authorities (Alberta Health Services)	2	0	0	2
Dr. Anthony John Ford	0	0	1	1
Dr. Finola Fogarty	1	0	0	1
Sub-Total	**3**	**0**	**1**	**4**

	Orders	Decisions	Public Investigation Reports	Total
***PIPA* Respondent**				
Alberta Distillers Inc.	1	0	0	1
Alberta Teachers' Association	0	1	0	1
Anthony Clark International Insurance Brokers Ltd.	1	0	0	1
Avonlea Photography Studio Inc.	1	0	0	1
Brooklyn Industrial Oilfield Inc.	1	0	0	1
Calgary Co-operative Association Limited	2	0	0	2
The Churchill Corporation	2	0	0	2
Clean Harbours Lodging Services	1	0	0	1
Desjardin Financial Security	1	0	0	1
Engel Brubaker	1	0	0	1
ExxonMobil Canada Inc.	1	0	0	1
Great West Life Assurance Company	1	0	0	1
Guardian Interlock Service (Canada) Inc.	1	0	0	1
Imperial Oil Ltd.	1	0	0	1
Insight Psychological	1	0	0	1
Lafarge Canada Inc.	1	0	0	1
Mark's Work Wearhouse	0	0	1	1
Murphy Industrial Oilfield Inc.	1	0	0	1
Odyssey Health Services	1	0	0	1
Staples Canada Inc.	1	0	0	1
Stuart Olson Constructors Inc.	1	0	0	1
Synergen Housing Co-op Ltd.	1	0	0	1
Whitehorn Village 1 Condominium Corporation	1	0	0	1
Sub-Total	**23**	**1**	**1**	**25**
Total	**64**	**3**	**3**	**70**

***FOIP* Orders:** **38 (42 cases)**
***HIA* Orders:** **3 (3 cases)**
***PIPA* Orders:** **23 (24 cases)**

This Table contains all Orders released by the OIPC whether the issuance of the Order concluded the matter or not. The OIPC has issued Orders during this Fiscal Year that related to the matter but did not conclude/close the file.

Notes: Orders with one order number covering more than one public body or organization are counted as one order; an order containing more than one order number is counted according to the number of order numbers listed on the order.

Some Orders and/or Report Numbers were assigned to more than one case.

Orders are recorded by the date the Order was signed, rather than the date the Order was publicly released.

Under the legislation, only certain case types can proceed to inquiry if the matters are not resolved at mediation/investigation. The above statistics are those case types that can proceed to inquiry (Request for Review and Complaint files).

Please refer to **Tables 1** and **2** and **Appendices A** and **B** for total cases opened and closed. A copy of all Orders and Investigation Reports are available on the Office's web site **www.oipc.ab.ca**.

Appendix D: Accepted Privacy Impact Assessments by Public Body and Custodian Type: 2010-11

STATISTICS ARE FROM THE PERIOD APRIL 1, 2010 TO MARCH 31, 2011

Public Body	PIA Title
Ministries/Departments	
Alberta Advanced Education & Technology	Apprenticeship, Trade and Occupation Management System (Atoms)
Alberta Education	Review of the Provincial Approach to Student Information (PASI)
	Provincial Approach to Student Information (PASI) – Addendum
Alberta Employment and Immigration	Temporary Foreign Worker (TFW) Advisory Office
	Information and Privacy Office Reaction Software
Alberta Health and Wellness	Enterprise Information Management (EIM) Initiative
Alberta Health Services	Simulation Information Management System
	Alberta Health Services Provided Registry
Alberta Housing and Urban Affairs	Homeless Information Management Database
Alberta Justice and Attorney General	ReClaim
Alberta Transportation	Commercial Driver Abstract
Service Alberta	Mainframe Application Hosting Services (MAHS)
Municipalities	
City of Calgary	Video Surveillance at City of Calgary Sites
	Assessment for City of Calgary FCSS Social Inclusion Indicators Project
City of Cold Lake	City of Cold Lake PIA and Surveillance Cameras Located in Public Areas
Strathcona County	NewOrg Management Systems (Homes Database Replacement)
School District	
Edmonton Public School District No. 7	GoogleShare
Universities	
University of Alberta	Google Application and Gmail Project

Custodians	PIA Title
Regional Health Authorities (Alberta Health Services)	Chinook's Implementation of Vista EasyLink in Laboratory Services
	Xanantec Outpatient Geriatrics Database
	Alberta Health Services Data Repository for Reporting (AHSDRR)
	AHS Reporting and Learning System (RLS)
	E.A.C.T. Feedback and Concerns Tracking System – Pilot
	AHW and AHS Mental Health Reporting – Inpatient Interval Reporting (MHR-IIR) Project
	Implementation of EngroPRO GI Management Software in Fort McMurray and Grande Prairie PIA
	Food Processor SQL Upgrade PIA Amendment
	Amendment to the Calgary Health Regional Mediscribe PIA
	Amendment to the Calgary Rural MediPatient PIA
	Patient Care Information System/Sunrise Clinical Manager (SCM) – Phase 2
	PIA Addendum Patient Experience Surveys
	PIA: Amendment to Sunrise Clinical Manager
	PIA: Amendment to Sunrise Clinical Manager
	Xanantec Outpatient Geriatrics Database
	EMS Electronic Patient Care Reporting PIA
	Conscious Sedation Database for Pediatric Patients PIA

Custodians	PIA Title
Alberta Health Services, Continued...	Alberta Health Services Data Matching Project between AHS Screening Programs, Physicians and/or PCN and Alberta Health and Wellness
	Implementation of Olympus' Endoscopy Information Management Solution – EdoWorks 7.4 Image Manager in Southern Alberta in Conjunction with Cancer Care's Colorectal Cancer Screening Project
	Amendment to the former ACB and AHW's joint PIA for Alberta Cervical Cancer Screening Programs(ACCSP)
	Simulation Information Management System
	Amendment to East Central Health Region Surgical Audit Database
	Amendment to the Calgary Health Region Sunrise Clinical Manager PIA
	Amendment to the former ACB Alberta Colorectal Cancer Screening Program (ACRCSP) PIA
	Emergency Medical Services (EMS) IT Transition from the City of Calgary to AHS
	Syncrude Centre for Motion and Balance Gait Analysis Clinical Database PIA
	Comprehensive Tissue Centre Database
	Registration Continuance Project
	CoPathPlus Reporting Program Amendment (to include former Cross Cancer Institute records) Title – Sunquest Laboratory Information System and Cross Cancer Institute (CCI) Lab Transition
	Amendment to the FACT – Feedback and Concerns Tracking System (Pilot)
	Alberta Health Services Transition of Sexually Transmitted Infection (STI) and Tuberculosis (TB) Applications from Alberta Health and Wellness to Alberta Health Services Privacy Impact Assessment
	First Addendum to the Alberta Blue Cross Non-Group Coverage Billing Transfer from Alberta Health and Wellness to Alberta Blue Cross
	Primary Care Data Matching Initiative with Health Quality Council of Alberta
Physicians	
Dr. Frank Spence	Data Input and Reporting for Myocardinal Perfusion Imaging with APPROACH Program for Cardiology Plus (Calgary) Inc
Dr. Baljinder Mann	Langdon Medical Clinic
Dr. I. Gardiner	Radiology Information System [RIS]
Dr. I. Gardiner	Teleworking Initiative
Dr. Norman Yee	Health Portal PIA Amendment
Dr. Barney T.H. Truong	Participation in the Calgary Mosaic Primacy Care Network
Dr. Mohab Ghobrial	Billing and Scheduling
Dr. Jorge Mayo	Diagnostic imaging – ultrasound text reports from Dr. Mayo will be uploaded into an AHS housed data respository from which they can be accessed by the provincial health records applications and view by authorized Alberta Netcare users.
Dr. David Strydom; Dr. Selby Frank; Dr. William Labuschange; Dr. Helen Frank; Dr. Ahmed Abulala; Dr. Nur Parker	Participation in the Vegreville Primary Care Network
Dr. I. Gardiner	Electronic Medical Record (EMR)/Radiology Information System (RIS)/ Picture Archiving Communication System (PACS) Implementation Project and Teleworking Initiative
Dr. Joseph A. D'Costa; Dr. Amar Singh	Transcription Services PIA
Associate Clinic – Dr. Tuhin Bakshi; Dr. Gunther Schienther; Dr. Ivars Argals; Dr. Michael Kirwan; Dr. Daniel Van Den Bert; Dr. Deborah Jeffrey; Dr. Erik Johnson; Dr. John Brand; Dr. Terrence Drolet; Dr. Mukhtar Haaidar; Dr. Petrus Von Tonder	Participation in the Wetaskiwin and Area Primary Care Network (PCN)
Community Clinic Physicians & Surgeons – Dr. Kalavati Patel; Dr. Bhasker Patel; Dr. Ziaul Ansari Wetaskiwin Family Medicine Practice – Dr. William Hendriks; Dr. Johannes Venter; Dr. Lourens De Wet; Dr. Franie Erwee; Dr. Johannes van der Wait	
Tower Clinic – Dr. Helgardt Dippenar; Dr. Brian Peter Lee; Dr. Leanda Stassen; Dr. Simon Ward; Dr. John Tam	
Wetaskiwin Hospital & Care Centre – Dr. Mohammed Badawi	

Custodians	PIA Title
Dr. Robert L. Stubbs; Blair, Stubbs & Associates Radiology Inc.	Amended PIA: Radiology Information System (RIS) Upgrade and Picture Archiving Communications System (PACS)
Dr. Meghan Elkink	Amendment PCN Nurse Access to EMR
Vermilion PCN (AHS) – Dr. Anre Louw; Dr. Charl Duvenage; Dr. Omor Bhuiyan; Dr. George Stewart-Hunter	Participation in the Vermilion Primary Care Network
Dr. Ian Huang	www.bookingmd.com PIA
Grande Prairie PCN – Dr. Peter Lindsay; Dr. Alex Noga; Dr. Guhle; Dr. Brad Martin, Dr A. Barreth; Dr. James Pope; Dr. Eleanor Andrews; Dr. Adel Belhaj; Dr. Muwonge; Dr. Kiggundu; Dr. Kim; Dr. Nyachwo; Dr. Ted Mequanet; Dr. Tom Pebbles; Dr. Obaid Afridi; Dr. Yao Shengtao; Dr. Hasseebullah Aamani; Dr. Nic du Duplessis; Dr. Anthony Echezona; Dr. James Pope; Dr. Richard Martin; Dr. Adel Belhaj; Dr. Ian Renfree; Dr. Thur Want; Dr. Pebbles; Dr. M. Muri; Dr. P. Muri; Dr. Cled Lewis; Dr. Sanja Minic; Dr. Brenda Millar; Dr. Stanley Muwonge; Dr. Caroline Nyachwo; Dr. Donna Mumert; Dr. Woi Joo Kim; Dr. Frederick Kiggunda; Dr. Brent Piegrass; Dr. Marilyn Patterson; Dr. Pieterse	Part A as part of the Grande Prairie PCN
Alta PACS Inc.	PIA updated for EFW Radiology
Alta PACS Inc.	Addendum to EFW Radiology
Alta PACS Inc.	Update - EFW Radiology
Dr. Charlene Dunn	Participation in the Calgary Mosaic PCN (H2225)
Dr. Benjamin Chiam	Pulmonary Function Laboratory Implementation PIA
Dr. Lorne Poon of the New Image Cosmetic & Medical Centre	Surveillance Cameras
Dr. Ardythe Taylor, Breast Cancer Supportive Care Foundation	Breast Cancer Supportive Care Foundation
Dr. Eleanor Stein	Outsourced Transcription
Dr. Judy Wing Shuen Li; Dr. Ling Pui Yu	Participation in the Southside PCN
Dr. W.A. (Bill) Emery	Alberta Netcare
Dr. Jack Y. Chu; Dr. Sandi Frank; Dr. David McManus	Alberta Netcare
Dr. Allan Garbutt; Dr. William Sara; Dr. Peter McKernan; Dr. Leslie Garland	Alberta Netcare
Dr. Barrie Steed; Dr. Silvia Watman; Dr. David Lyons; Dr. Shaunna Menard	Alberta Netcare
Dr. Martin Davies; Dr. Cheryl Whitehead; Dr. Dena Keashly	Alberta Netcare
Dr. Pramod K. Verma	Alberta Netcare
Dr. Leon Burger; Dr. Michael Burger	Alberta Netcare
Dr. Werner De Vos	Alberta Netcare
Dr. Abaya Venumbaka; Dr. Siv Anand Venumbaka	Alberta Netcare
Dr. Zbigniew Sawicki	Alberta Netcare
Dr. J.F. (Ted) Thaell	Alberta Netcare
Dr. Hakique Virani; Dr. Shainoor Ismail; Dr. Huiming Yang	Alberta Netcare
Dr. W. A. Ruzycki	Alberta Netcare
Dr. Norbert J. Witt; Dr. Ken Makus; Dr. Robert Pilroy	Alberta Netcare
Dr. Ruben G. Hansen	Alberta Netcare
Dr. Wojciech S. Bzezinski	Alberta Netcare
Dr. Dan J. Hodges	Alberta Netcare
Dr. Bruce Hoffman	Alberta Netcare
Dr. Sandra Ghitter-Mannes; Dr. James G. Reilly; Dr. Brian D. McAlpine	Alberta Netcare
Dr. Roberta E. Grynoch	Alberta Netcare
Dr. M. S. Mah	Alberta Netcare
Dr. Keet Pent Wong	Alberta Netcare
Dr. Michael J. W. Smith	Alberta Netcare
Dr. Darryl Bartie; Dr. Jacolette Hattingh; Dr. Peter McGovern	Alberta Netcare
Dr. Paulouse J. Paul	Alberta Netcare
Dr. M. B. Bozdech	Alberta Netcare
Dr. Philip A. Hardin	Alberta Netcare
Dr. John Mark Mahood; Dr. Charles Bester; Dr. Magarietha Johanna DuPlooy; Dr. Josias Michael Grobler; Dr. Carey Richard Molberg; Dr. Desmond Shulman	Alberta Netcare
Dr. Brian L. Oldale	Alberta Netcare
Dr. Gordon E. Searles	Alberta Netcare
Dr. Kelleigh Klym; Dr. Victoria Kendrick; Dr. Susan Carpenter; Dr. Lori Hogg; Dr. Monika Schulz	Alberta Netcare
Dr. Gerald A. Vaz	Alberta Netcare
Dr. Tim Yep; Dr. Scott D. Holder; Dr. Feliciem Mbuyi	Alberta Netcare

Custodians	PIA Title
Dr. Theodore Joseph Jablonski; Dr. Sandra E. Foss; Dr. Patrick Chi Wang Lai; Dr. Simon Arthur; Dr. Juilan Chew; Dr. Suzanie Farouk Habashy; Dr. Sameena Merchant; Dr. Don Ramsey; Dr. Sara Wiesenberg; Dr. Harwant Van Zuiden; Dr. Mikeala Chaudhary; Dr. Al Stanhope; Dr. Barry Hardin; Dr. Brian Spence	Alberta Netcare
Dr. Dale Malus; Dr. Barbara Hardt	Alberta Netcare
Dr. Romulad Zapasnik; Dr. John George Fegler; Dr. Stephanie Kozma; Dr. Joanna Z. Stuchly; Dr. Russell James Paul Sawa; Dr. Marta Zapasnik	Alberta Netcare
Dr. Weisz; Dr. Kretzul; Dr. Rasheed A. Hosein	Alberta Netcare
Dr. Joseph A. D'Costa; Dr. Amar Singh	Alberta Netcare
Dr. Talib Muhammed	Alberta Netcare
Dr. Kar C. Quek; Dr. Michael Kiltz	Alberta Netcare
Dr. Paul M. K. Leung; Dr. Robert A. Balyk; Dr. Jeff Bury; Dr. David Otto	Alberta Netcare
Dr. Jamie Irvine; Dr. Dhiren Naidu; Dr. Steven Helper; Dr. Tony Giantomaso; Dr. Sherif El-Maadawy; Dr. David Block; Dr. Shelby Karpman; Dr. Boris Boyko; Dr. Robert Hauptman; Dr. Garin Cheung; Dr. Valeria Lyubetska; Dr. Darshan Pandher	Alberta Netcare
Dr. Ernest E. York	Alberta Netcare
Dr. Cathy Copeland	Alberta Netcare
Dr. Mei Sum Maxim Fox	Alberta Netcare
Dr. Catherine M. Zip; Dr. Howard Benjamin Cohen	Alberta Netcare
Dr. Gerhard van der Westhuizen; Dr. Mark J. Vacy-Lyle	Alberta Netcare
Dr. Gounden	Alberta Netcare
Dr. James Cotley; Dr. Jaimala Maharaj	Alberta Netcare
Dr. Dorcas Kennedy; Dr. Meg Simpson; Dr. Jullie Smith; Dr. John Kennedy; Dr. Lana Wicentovich; Dr. Jennifer Burke; Dr. Karen Robertson; Dr. Wallace Smart	Alberta Netcare
Dr. Anil Singh	Alberta Netcare
Dr. Richard Hatfield; Dr. Pieter Cloete	Alberta Netcare
Dr. William So; Dr. Duncan Ho; Dr. Hans Yamamoto	Alberta Netcare
Dr. Stephen Kwan	Alberta Netcare
Dr. P. Swarts; Dr. J. Badenhorst; Dr. C. Grundling; Dr. N. Basson; Dr. J. Rossouw; Dr. D. Webb; Dr. D. Boorman	Alberta Netcare
Dr. Lorne Poon	Alberta Netcare
Mr. Kyu Min Oh	Alberta Netcare
Dr. V. Velmurugiah	Alberta Netcare
Dr. Susan Carpenter	Alberta Netcare
Dr. T. Ford; Dr. D.A. Rautenbach; Dr. A. Bilston; Dr. K. Daniel; Dr. W. Hildebrandt; Dr. M.J. Thibault	Alberta Netcare
Dr. Ardythe Taylor; Dr. Helen Cho; Dr. Elu Thompson; Dr. Anitra Mamen	Alberta Netcare
Dr. Michael Kroetsch	Alberta Netcare
Dr. Eleanor Stein	Alberta Netcare
Dr. Andries Niemann; Dr. Magda du Plessis; Dr. Elinor Van Veenhuyzen	Alberta Netcare
Dr. Leslie Ellestad	Alberta Netcare
Dr. Judy Wing-Shuen Li; Dr. Ling Pui Yu	Alberta Netcare
Red Deer – Central Alberta Methadone Program Clinic; Dr. Wayne Church; Dr. Glenn Kowalsky	Alberta Netcare
Calgary – Second Chance Recovery; Dr. Ian Postnikoff; Dr. Glenn Kowalsky	
Medicine Hat – Chinook Alberta Methadone Program; Dr. Ian M. Postnikoff	
Lethbridge – Northside Methadone Program; Dr. Jacob Barsky; Dr. Ian Postnikoff	
Dr. Douglas M. Anderson; Dr. Grace Simmons	Alberta Netcare
Dr. Simon Arthur; Dr. Laura Bennion; Dr. Jeremy deBruyn; Dr. Glenn Gould; Dr. Jean Rawling; Dr. Kathy Reynolds; Dr. Paul Toye; Dr. Donna Wachowich	Alberta Netcare
Dr. Francois Oosthuizen; Dr. Marthinus Strydom; Dr. Rulene Mare	Alberta Netcare
Dr. Trevor T.C. Vu	Alberta Netcare
Dr. Anil Prakash	Alberta Netcare
Dr. Hajira Danial; Dr. Heather Robinson; Dr. Chris Hoskins; Dr. Gul Jiwa; Dr. J. Georges Sabourin; Dr. Sarah Halleran; Dr. Ann Marie Long; Dr. Amanda Romanovsky	Alberta Netcare
Dr. Donald Wilson	Alberta Netcare
Dr. Marthinus H. Doman; Dr. Jan G. Fourie	Alberta Netcare
Dr. Ming C. Chou	Alberta Netcare
Dr. Norman Patrick Costigan; Dr. N. D. Monkman	Alberta Netcare
Dr. Bradford D.M. (Brad) Mechor	Alberta Netcare

Custodians	PIA Title
Dr. Maurice Blackman	Alberta Netcare
Dr. Cameron S. Mothaliek	Alberta Netcare
Dr. Andre J. Botha	Alberta Netcare
Dr. Philip Wessels	Alberta Netcare
Dr. Surinder Khinda	Alberta Netcare
Dr. Wolfgang M. Struck	Alberta Netcare
Dr. Kim L.L. Truong; Dr. Do Huu Truong; Dr. Barney T. H. Truong	Alberta Netcare
Dr. Jozef Van Niekerk	Alberta Netcare
Dr. Arkadiusz (Art) N. Jaroni	Alberta Netcare
Dr. Lindi Scribante	Alberta Netcare
Dr. Dianne Brox; Dr. Anne Bowland; Dr. Brian Gillanders; Dr. Bill Sue; Dr. Jay Govender; Dr. Mike Nutting; Dr. Verne Chichak	Physician Office System Program
Dr. Pat Connick; Dr. Lori Gohill; Dr. Harjot Singh; Dr. Christina Siauw	Physician Office System Program
Dr. Suhaib Al-Kurtass; Dr. Paul Vincent Greenwood; Dr. William Keeble; Dr. Timothy Gerald Muzyka; Dr. Marcelo Coelho Shibata	Physician Office System Program
Dr. Gabriel Cahill; Dr. David Yip	Physician Office System Program
Dr. Wojciech S. Brzezinski	Physician Office System Program
Dr. Jozef Van Niekerk	Physician Office System Program
Dr. Bryan J. Donnelly; Dr. Martin Duffy [Duffy; Dr. Donald Metcalfe	Physician Office System Program
Dr. Hani Ayad	Physician Office System Program
Dr. Penny Borghesan; Dr. Alfred Dei-Baning; Dr. Paul Lakra; Dr. Ashalatha Paul; Dr. Chhotalal Thakkar; Dr. Elizabeth Thakkar; Dr. John Zubis; Dr. Meenakshi Nanda; Dr. Lalji Gohill; Dr. David Goddard; Dr. Alexander Morrison; Dr. R.R. Singh	Physician Office System Program
Dr. Chung-Ling Benny Cheung	Physician Office System Program
Dr. Aravind Subramanian; Dr. Karima Ali; Dr. Rodney Payne	Physician Office System Program
Dr. George Iwaniuk; Dr. Mangi Narsey Tauh; Dr. H. Richard Uretsky; Dr. Aubrey David Uretsky	Physician Office System Program
Dr. Johannes Meyer	Physician Office System Program
Dr. Aporna Kali	Physician Office System Program
Dr. Mihaela Chaudhary; Dr. T. Truong; Dr. K. Choi; Dr. O. Kutskyy	Physician Office System Program
Dr. Naomi White	Physician Office System Program
Dr. Kirk Barber	Physician Office System Program
Dr. Christopher Lever; Dr. Tanya Lynn Buors; Dr. Neil D. J. Cooper; Dr. Christopher G. Lever; Dr. Elizabeth M Shykeyko; Dr. Lori Walker; Dr. Monique Dianne Marie Wright	Physician Office System Program
Dr. S. Mouhammed; Dr. A. Abdalla; Dr. M. Lim	Physician Office System Program
Dr. Lois Milne; Dr. Eileen Ma; Dr. Janet Rogers De. Marina Skulsky; Dr. Madhu Aul; Dr. Charles Yum; Dr. Diana Grainger; Dr. Maureen Pennington; Dr. Julie Hong; Dr. Lois Torfason; Dr. Lisa Friedland; Dr. David Pow; Dr. Sarah Cairncross; Dr. Jodi Oosman; Dr. Heidi Von Engelbrechten	Physician Office System Program
Dr. Sarit Sengar; Dr. Donovan Kreutzer; Dr. Mariette Van Wyk	Physician Office System Program
Dr. Marie-Eve Langlois; Dr. Todd Gash; Dr. Adrian Wladichuk	Physician Office System Program
Dr. Celeste Dietrichsen; Dr. Robert J. Simpson; Dr. Jacobus Petrus Lodewickus Van Straaten	Physician Office System Program
Dr. Elizabeth Lange	Physician Office System Program
Dr. Mohamed Elmusharaf	Physician Office System Program
Dr. Raymond Cheung; Dr. Roderick Kaasa; Dr. Linda Nguyen; Dr. Bobby Sreenivasan; Dr. Donald Rempel	Physician Office System Program
Dr. Jeffrey Scott Bratvold	Physician Office System Program
Dr. Carlo D.A. Panaro	Physician Office System Program
Dr. Sameena Ashraf Bajwa; Dr. Maria Magdelana Botha; Dr. Mia du Plessis; Dr. Adhikar hagwandas okul; Dr. Roelof Gous; Dr. Paul J. Jansen; Dr. Abdul Qadir Kamran; Dr. Alison J. Knight; Dr. Roderick L. Ishi; Dr. Jo Ann Robinson; Dr. Nasreen Sheik; Dr. Robert John White; Dr. Brian Douglas Willis	Physician Office System Program
Dr. Moises Lasaleta; Dr. Michelle Hart; Dr. Stella Jensen van Rensburg; Dr. Hilda Morales; Dr. Van Nguyen	Physician Office System Program
Dr. Samir Mouhammed; Dr. Sahar Moussa; Dr. Haroon Hamid; Dr. Maileen Lim; Dr. Anwer Abdalla	Physician Office System Program
Dr. Steven Turner; Dr. Du Duong; Dr. Allan Hoeve; Dr. Leoni Kelly; Dr. Gert Nel; Dr. Foose Onsongo; Dr. Johann van der Vyer; Dr. Deon Vorster; Dr. Jaco Hoffman; Dr. Elizabeth Hoffman	Physician Office System Program
Dr. Ron Mayhofer; Dr. Martelle Preller; Dr. Jamie Chau	Physician Office System Program
Dr. Dan Manning; Dr. Shirley Semaka	Physician Office System Program
Dr. Scott F. Wilson	Physician Office System Program

Custodians	PIA Title
Dr. M. Robin Nawrot; Dr. Michael G. Boorman; Dr. Jurie Hendrik de Bruyn; Dr. K.P. Adzich; Dr. M.L. Wickland-Weller; Dr. Christine J. Ellis	Physician Office System Program
Dr. Paludet	Physician Office System Program
Dr. Paul L. Martyn	Physician Office System Program
Dr. Nirmala Brar	Physician Office System Program
Dr. Helene Cuddihy; Dr. Phuoc Hai Le; Dr. Jennifer Minsos; Dr. Marc Saint-Martin	Physician Office System Program
Dr. Phil Vogel; Dr. Hassan Lockhat; Dr. Francois du Toit	Physician Office System Program
Dr. Jeffery Symyk; Dr. Christine Luelo; Dr. Lisa Penner; Dr. Susan Dixon	Physician Office System Program
Dr. Lanice K. Jones; Dr. Lorraine Croft; Dr. Andrea Hull; Dr. Thiru Govender; Dr. Tony Lo; Dr. Pauline Ekwalanga; Dr. Jill Teschke; Dr. Sandra Allaire; Dr. Jean Rodrigues Mateo	Physician Office System Program
Dr. Thomas R. Ranieri; Dr. Alison Martel; Dr. Veyantiz Naidu Robert Turner	Physician Office System Program
Dr. Eric Baker; Dr. Gregory Smith; Dr. Terrence Smith; Dr. Clayne Steed; Dr. Wallace Tollestrup	Physician Office System Program
Dr. Magarietha Johanna du Plooy	Physician Office System Program
Dr. Shashi Lota; Dr. Emma Beehary; Dr. D. Beehary; Dr. Kamal Ganatra; Dr. L. Gohil locum	Physician Office System Program
Dr. Jane Cho; Dr. Sanjay Wadhara	Physician Office System Program
Dr. Supriya Goyal; Dr. Yasmin Majeed; Dr. Agata Nowak; Dr. Jeff Pivnick; Dr. Anna Stys; Dr. Karim Surani; Dr. NiNi Zaw-Tun	Physician Office System Program
Dr. Marie Stevenson; Dr. Farook Oosman; Dr. Linda Fong; Dr. Olga de Sanctis; Dr. Duff Horne; Dr. Yi-Hui Sun	Physician Office System Program
Dr. Moti Lal	Physician Office System Program
Dr. Martin Cole; Dr. Chalmers-Nixon	Physician Office System Program
Dr. Monique Withers; Dr. Caroline Bain; Dr. Brent Kinnie; Dr. Susan Kinnie; Dr. Richard Zabrodski	Physician Office System Program
Dr. Jacob Johannes Maritz; Dr. Andries Johannes Botha	Physician Office System Program
Dr. Catherin Heimbach; Dr. Stephanie Kerwin; Dr. Laura O'Neill; Dr. Jaclyn Safran; Dr. Dinaa Taub; Dr. Brendan Baughan; Dr. Natalie Ward	Physician Office System Program
Dr. SN Anna Nsisi	Physician Office System Program
Dr. Richard Barr	Physician Office System Program
Dr. Ashif Shiraz Jaffer; Dr. Dianne Elizabeth Smith	Physician Office System Program
Dr. Yahaya Aniki	Physician Office System Program
Dr. Beverly Gold; Dr. Ian Kendal; Dr. Stella Jansen Van Rensburg; Dr. Misty Watson	Physician Office System Program
Dr. I. Amusan	Physician Office System Program
Dr. F. Akindele	Physician Office System Program
Dr. Larry Hunka; Dr. Ronald Henderson; Dr. Kelly Dabbs; Dr. David Callahan	Physician Office System Program
Dr. Judy Cheng; Dr. Therese Chua; Dr. Gloria Mok; Dr. Deborah Rowand; Dr. Pierre Flor-Henry	Physician Office System Program
Dr. Darcie Kiddoo	Physician Office System Program
Dr. Jack Bromley; Dr. Robert Cooper; Dr. Lauralee Dukeshire; Dr. Bradley Grieg; Dr. Joseph Hopfner; Dr. Ron Jarvis; Dr. John Julyan Gudgeon; Dr. Shirley Hovan; Dr. Raymond Hulyk	Physician Office System Program
Dr. Leonard de Freitas; Dr. Louis Coetzee; Dr. Jacobus Muller; Dr. Cornel Smith; Dr. Tharine van Deventer; Dr. Nadia du Toit; Dr. Edwards Ndovi; Dr. Willem Gouws; Dr. Marne Hauptfleisch; Dr. Guy Lamoureux; Dr. Cecile Lavoie; Dr. Nardus vanRooyen; Dr. Amelia DuPreez; Dr. Irma Kritzinger	Physician Office System Program
Dr. James McCracken; Dr. Folake Pepple; Dr. Dale Berry; RN Nicole Entz	Physician Office System Program
Dr. Catherine Heaton; Dr. Sheila Scott	Physician Office System Program
Dr. Byron Wong; Dr. Jane Cassie; Dr. Douglas Yeung; Dr. Nathan Chan	Physician Office System Program
Dr. Cathryn Kuzyk	Physician Office System Program
Dr. Paul Marck	Physician Office System Program
Dr. Tony Ogundipe; Dr. Sarit Sengar; Dr. Herbert Mukiini; Dr. Victor Agoa	Physician Office System Program
Dr. Simon T. James	Physician Office System Program
Dr. Paraminder Singh; Dr. Mary Michael; Dr. Mohammed Abdel-Hafex; Dr. Tariq Awan; Dr. Jose Madrilejos; Dr. Roberta Steiger	Physician Office System Program
Dr. Moises Lasaleta; Dr. Tariqu Awan; Dr. Urszula Kozowska; Dr. Jose Madrilejos; Dr. Lorne Straza	Physician Office System Program
Dr. Dilip Nandi; Dr. Soliman Baila; Dr. Mohamed Jalal Kamal Farhat; Dr. Suresh R. Kanani; Dr. Maria Hanna Krzywicka; Dr. Lynne Murgin; Dr. Jayashri Kar Nandi; Dr. Kristina Zakhary; Dr. Robert Harper; Dr. Kil Wilmot; Dr. Ron Young	Physician Office System Program
Dr. Timothy Clugston; Dr. Brian Josephson	Physician Office System Program
Dr. Stephen Bell; Dr. Leon Bezuidenhout; Dr. William Fowler; Dr. J. Heeg	Physician Office System Program
Dr. Mariette Muller	Physician Office System Program
Dr. Ashok K. Sachdeva	Physician Office System Program

Custodians	PIA Title
Dr. Mark Montgomery	Physician Office System Program
Dr. Andrew Li	Physician Office System Program
Dr. Abdul Qadir Kamran; Dr. Sameena Ashraf Bajwa	Physician Office System Program
Dr. Loretta Fiorillo	Physician Office System Program
Dr. Rozemin Devraj-Kizuk	Physician Office System Program
Dr. Sonya Varma	Physician Office System Program
Dr. Lynn R. Edwards; Dr. Jerry Woodruff	Physician Office System Program
Dr. Gene S. Vitug	Physician Office System Program
Dr. Meghna P. Juta	Physician Office System Program
Dr. Roelof Botes; Dr. Anthony Gigg; Dr. Charles Henegan; Dr. Alex Smith	Physician Office System Program
Dr. Abdelbasat (Basat) Aborawi; Dr. Abdul Aziz; Dr. Rhona Capisonda; Dr. John Holland; Dr. Ilona Levin	Physician Office System Program
Dr. Olufemi Adekey; Dr. Ashesh Pabbies; Dr. Delee Rohatinsky	Physician Office System Program
Dr. Melvyn Ross Lavallee; Dr. Emile Samual Johannes Muller; Dr. Herbert Odi Onwudiwe; Dr. David John Piesas; Dr. Jated James VanBussel	Physician Office System Program
Dr. Stephen Dougherty; Dr. John Faul; Dr. Neil Peniston	Physician Office System Program
Dr. J. Hunter; Dr. E. Clow; Dr. H. Balouch	Physician Office System Program
Dr. Michael Ngan; Dr. H. Olijnik; Dr. A. Esmail; Dr. G. Sawisky; Dr. Youakim	Physician Office System Program
Dr. Jose Luis Fernandez De Lara Nieto	Physician Office System Program
Dr. Kevin Wong; Dr. Christine Malcolm	Physician Office System Program
Dr. Boris Iwashkiw; Dr. Sanjeev Bhardwaj; Dr. Gregory Boughen; Dr. Gert Ehlers; Dr. Anthony Jones; Dr. Olabisi Odugedemi; Dr. Oluwole Odugedemi; Dr. Henry Quaye	Physician Office System Program
Dr. Brendan Adams	Physician Office System Program
Dr. Joseph Doherty; Dr. Victor Fadayomi	Physician Office System Program
Dr. Patti Farrell	Physician Office System Program
Dr. Gerald A. Miller	Physician Office System Program
Dr. Hermanus Hendrikus Potgieter; Dr. Joseph Eamon Cunningham; Dr. Gert Johannes Grobler	Physician Office System Program
Dr. Bruce Hoffman	Physician Office System Program
Dr. Santosh Dubey	Physician Office System Program
Dr. Ashref Elfiky; Dr. Mohsen Adams	Physician Office System Program
Dr. Ronald T. Garnett; Dr. Graham Law; Dr. Fariba Aghajafari; Dr. Juan Antonio Garcia-R; Dr. Angela Tarazona-R; Dr. Heather Armson; Dr. Wes Jackson; Dr. Keith Wycliffe-Jones; Dr. Rod Crutcher; Dr. Heather Eliason; Dr. Pawel Niemczewski	Physician Office System Program
Dr. Peter Bell; Dr. Fraser Brenneis; Dr. Joanne Caulfield; Dr. Julia Chronopoulos; Dr. Michel Donnoff; Dr. Paul Humphries; Dr. Raegan Kijewski; Dr. Douglas Klein; Dr. Sudha Koppula; Dr. Andrea Milne-Epp; Dr. David Mootes	Physician Office System Program
Dr. Neil Bell; Dr. Rene Brownoff; Dr. Amandeep (Sheny) Khera; Dr. Timothy Kolotyluk; Dr. Lisa Jane Stebilecki; Dr. Ann Lee; Dr. Michell Morros	Physician Office System Program
Dr. Jakob Jan Dekker; Dr. A. Van Jaarsveld	Physician Office System Program
Dr. Jim Dickinson; Dr. Wendy Tink; Dr. Doug Myhre; Dr. Ron Garnett; Dr. Paul Woods; Dr. Dennis Kreptul; Dr. Shanda Slipp; Dr. Jacqui Lewis; Dr. Maeve O'Beirne; Dr. David Keegan; Dr. Sonya Lee; Dr. Roger Thomas; Dr. Cathy MacLean	Physician Office System Program
Dr. Young William Phiri	Physician Office System Program
Dr. Lauren McCarth; Dr. Padraic McCombe; Dr. Johan van Heerde	Physician Office System Program
Dr. John S.J. Bradley; Dr. Sabin Shurraw; Dr. Shelley L. Duggan	Physician Office System Program
Dr. Edward John Aasman; Dr. Gordon William Brown; Dr. Kathleen Game; Dr. Kyle J. Garrett; Dr. Chris John Kendall; Dr. Johannes Peters; Dr. Gregg Robinson; Dr. Kimberly Ann Rogers; Dr. Harold Gordon Roth; Dr. James John Saunders; Dr. Stephanus Andreas Van Zyl; Dr. Allan Donald Witten; Dr. Erus Peens; Dr. Dolen Kirstein	Physician Office System Program
Dr. John Andreiuk; Dr. Hendrik Boshoff; Dr. Johannes Myburgh; Dr. Cornelis Claasen; Dr. Fiona Fordyce	Physician Office System Program
Dr. David M. Vermaak	Physician Office System Program
Dr. Maya Nishiwaki; Dr. Rosemarie Stepanko; Dr. Yad Haraphongse	Physician Office System Program
Dr. Vitendra Saujani	Physician Office System Program
Dr. Edward Denga; Dr. M. A. Chaudhry; Dr. Lindiwe L. Nyati	Physician Office System Program
Dr. Beverly V. Britz	Physician Office System Program
Dr. Johann Viljoen; Dr. R. Viljoen; Dr. S. Kruger; Dr. G. Begley; Dr. R. May	Physician Office System Program
Dr. Godwin Mouton	Physician Office System Program
Dr. L. Caffaro; Dr. A. Khaliq; Dr. M. Parsons; Dr. R. Rabeeh; Dr. J. Ustina; Dr. H. Wilkes	Physician Office System Program

Custodians	PIA Title
Dr. Margaret Allan Armstrong; Dr. J. Bradford Armstrong; Dr. Erica Button; Dr. Noel Benjamin Corser; Dr. Sarah Alison Corser; Dr. Francois Dreyer; Dr. Carol Evelyn Laird; Dr. Lee David Thomas Jones; Dr. Tanya Ruman; Dr. John Mark Stockburger; Dr. Charly A. Strytveen	Physician Office System Program
Dr. Jefferey Francis Chung; Dr. Robert Eugene Graham; Dr. Rex Wendell Jordan; Dr. Thumelelo Hlaleleni Judith Khoza; Dr. Johann Martin Kuschke; Dr. Dereck Njamba Maseka; Dr. David D. Miller; Dr. Ibrahim Adebare Moshood; Dr. Glen Sykes; Dr. Joachim F. Nettegen; Dr. Lawrence Abe Ollert; Dr. Elizabeth M. Racz; Dr. Daniel Rapula Thape	Physician Office System Program
Dr. Ernst Greyvenstein; Dr. M. Hnatiuk; Dr. A. Cullingham; Dr. C. Landy; Dr. G. Maclean; Dr. I Wiens	Physician Office System Program
Dr. Douglas Strilchuk; Dr. Heather Reese; Dr. Min Dua; Dr. Sharon Vaselenak; Dr. Dianne Schuldhaus; Dr. Michelle Craven	Physician Office System Program
Dr. Olumide Taiwo	Physician Office System Program
Dr. Johnson Fatokun	Physician Office System Program
Dr. K. Derouin	Physician Office System Program
Dr. Godwin Okolo	Physician Office System Program
Dr. Dale Robertson; Dr. Kathryn Cooke; Dr. Suzanne Perkins	Physician Office System Program
Dr. Derek Wolner	Physician Office System Program
Dr. Ahmed R. Doctat	Physician Office System Program
Dr. Pradeep Wadhwa; Dr. Patrick Davitt; Dr. Damanpreet Grewal; Dr. Bhikubhai Unarket	Physician Office System Program
Dr. Kerryn Roberge; Dr. Allison MacQueen; Dr. Brend Laupland; Dr. Adrian Gretton	Physician Office System Program
Dr. Raju Hajela	Physician Office System Program
Dr. Masoud Ali Gaas	Physician Office System Program
Dr. Carla M. Atkinson	Physician Office System Program
Dr. Derek D. Borowka; Dr. T. Flanagan; Dr. E. Holmes; Dr. M. Wong; Dr. S. Mausoll; Dr. A. Gainer; Dr. A. MacDonald	Physician Office System Program
Dr. S. Malan; Dr. Deon Erasmus	Physician Office System Program
Dr. Allison Denesuk; Dr. Charlene Kennedy; Dr. Pamela Kyle; Dr. Elaine Harris; Dr. Elizabeth Monaghan; Dr. Sandra Peacock; Dr. Laurie Ross; Dr. Kirsty Sloper	Physician Office System Program
Dr. Oliver David; Dr. Perry B. Glimpel	Physician Office System Program
Dr. Hari S. Chana; Dr. Laurene J. Brooks	Physician Office System Program
Dr. John D. Joffery	Physician Office System Program
Dr. Matthinus Van Der Walt	Physician Office System Program
Dr. Johannes Geers; Dr. John Albert Seim	Physician Office System Program
Dr. Isabel Martin	Physician Office System Program
Dr. Hugo Sutton	Physician Office System Program
Dr. Doug Mastel	Physician Office System Program
Dr. Bahn Al-Yousif; Dr. George Gish; Dr. Jeff Jones; Dr. Fraser Leishman; Dr. Scott Smith; Dr. Peter Yonemoto	Physician Office System Program
Dr. Victor Onwukwe	Physician Office System Program
Dr. Erich Van der Linde; Dr. Kenneth L. Folton; Dr. Jacobus Petrus De Beer Grobbelaar; Dr. Mari-Lyn Thomson	Physician Office System Program
Dr. Grobbelaar; Dr. Folton; Dr. Van der Linde; Dr. Thomson; Dr. Erich Van der Linde; Dr. Kenneth L. Folton; Dr. Jacobus Petrus De Beer Grobbelaar; Dr. Mari-Lyn Thomson	Physician Office System Program
Dr. Harvey Bablitz; Dr. Larry Kulak; Dr. Craig Hodgson; Dr. Barbara Fischer; Dr. Tahmeena Ali; Dr. Craig Lawrence; Dr. Andy Bainbridge	Physician Office System Program
Dr. Carol A.V. Linton	Physician Office System Program
Dr. David Ross; Dr. (Gary) Michael Allan; Dr. Danielle Behn-Smith; Dr. Deborah Corby; Dr. Christina Korowynyk; Dr. David Ross; Dr. Shakiebeh Edani; Dr. Rob Turner	Physician Office System Program
Dr. Mary Agnes Noiles	Physician Office System Program
Dr. J. Duvenage; Dr. Bhiyan; Dr. Louw	Physician Office System Program
Dr. Godwin Okolo	Physician Office System Program
Dr. Mullailla R.K. Suresh; Dr. Hema Suresh	Physician Office System Program
Dr. Andrew Kohler; Dr. R. Paquette; Dr. K. Romano; Dr. K. Jackman; Dr. A. Gokal	Physician Office System Program
Dr. Rohan Bissoondath; Dr. Satb Grewal; Dr. Julie Hong; Dr. Heather Taylor	Physician Office System Program
Dr. Dennis E. Fundytus; Dr. Richard Cote; Dr. Mike Foster; Dr. Nanatte Fouche; Dr. William Hanlon; Dr. Shelly Howk; Dr. Shelagh Lindsay; Dr. Robert McLaghlin; Dr. Tina Nicholson; Dr. Anna Tomanek	Physician Office System Program
Dr. Felix Odaibo	Physician Office System Program
Dr. Emmanuel Osegbue	Physician Office System Program
Dr. Tewodros Mequanent	Physician Office System Program

Custodians	PIA Title
Dr. Brian Muir; Dr. D. Barreth; Dr. I. Tayyeb	Physician Office System Program
Dr. Jeannette Soriano	Physician Office System Program
Dr. Joseph Oyeyemi	Physician Office System Program
Dr. Looyd I. Clarke; Dr. Robert Bruce Crawford; Dr. Douglas Brian Low; Dr. David Reed Playfair; Dr. Kimball J. Taylor	Physician Office System Program
Dr. George Torok Both; Dr. Dennis Cook; Dr. Ernest David Hilderman; Dr. Gerald Phillip Tober; Dr. Gregory Maxton Ninian; Fr. Franco Leoni; Dr. Leif-Erik Bredesen; Dr. Christopher Nichol; Dr. John N. Fletcher; Dr. Willem Hermanus Slabbert; Dr. Sunail Kumar; Dr. Tejinder Sanibhee; Dr. Ernst Retief Snyman; Dr. Neetu Saini; Dr. Wouter Leopoldt Hugo; Dr. Kevyn Letley; Dr. Babatunde Adetayo Awakan	Physician Office System Program
Dr. Mbongani Kabila	Physician Office System Program
Dr. Marci Wilson; Dr. Raymond Comeau; Dr. Mark Darby; Dr. Brian Dembinski; Dr. Kerry Johnstone; Dr. Nav Rattan	Physician Office System Program
Dr. P. Caffaro; Dr. N. Hirawan; Dr. P.L. Immeltman; Dr. K. Keaveny; Dr. J. Marillier; Dr. T. O'Keeffe; Dr. V. Sheoparshad	Physician Office System Program
Dr. Ayobami Oyebode	Physician Office System Program
Dr. T. Drolet; Dr. M. Haidar; Dr. L. Argais; Dr. T. Bakshi; Dr. J. Brand; Dr. D. Jeffery; Dr. D. Vandenberg; Dr. G. Schlenther; Dr. E. Johnson; Dr. Y. Moolla	Physician Office System Program
Dr. Danielle L. Nelson; Dr. Tracy L. Taylor; Dr. Cheri A. Stanzeleit	Physician Office System Program
Dr. Barbara Kellner	Physician Office System Program
Dr. Kamil Ghali; Dr. Sarjwan Khullar; Dr. Chander Mohini Khullar; Dr. Katmen Kerby; Dr. Donn Klay; Dr. Madelaine Cruz	Physician Office System Program
Dr. Lane Robson	Physician Office System Program
Dr. Bernard Nwaka	Physician Office System Program
Dr. Claudiu Iordache	Physician Office System Program
Dr. Helen Akosile Xulu	Physician Office System Program
Dr. Paul Tung; Dr. Zahra Mohamed	Physician Office System Program
Ministry	
Alberta Health and Wellness	Enterprise Information Management (EIM) Initiative
	Amended PIA: Addendum #1: Mental Health Reporting – Inpatient Interval Reporting (MHR-IIR) – Portal Name Correction
	Amendment to AB Provincial Stroke Strategy PIA
	Second Addendum to the Immunization/Adverse Event PIA
	Primary Care Initiative – Performance and Diligence Indicators PIA
	Métis Nations of Alberta Public Health Surveillance Program PIA
Pharmacies/Pharmacists	
Douglasdale Rexall #7283	Pharmacy Practice Models Initiative
Slave Lake Rexall #7218	Pharmacy Practice Models Initiative
Beaumont Rexall #7226	Pharmacy Practice Models Initiative
Spruce Grove Rexall Drug #7227	Pharmacy Practice Models Initiative
Harvest Hills Rexall Drug #7228	Pharmacy Practice Models Initiative
Heritage Rexall #7230	Pharmacy Practice Models Initiative
Capilano Rexall Drug #7251	Pharmacy Practice Models Initiative
Valley IDA Pharmacy	Pharmacy Practice Models Initiative
Canyon Meadows Rexall Drug #7282	Pharmacy Practice Models Initiative
Rexall UAH Outpatient Pharmacy #9801	Pharmacy Practice Models Initiative
Rexall Outpatient Pharmacy #9802 – Royal Alexandra Hospital	Pharmacy Practice Models Initiative
Katz Group Canada Ltd./Rexall – #7201 Crockett St. Mayerthorpe; #7203 51st St. Whitecourt; #7204 Fox Creek; #7205 Westlock Dwtn Westlock; #7206 50th Ave. Valleyview; #7207 53rd Ave. High Prairie; #7208 50th St. Barrhead; #7209 49th St. High Prairie; #7210 Westlock SC Westlock; #7211 Swan Hills; #7212 50th St. Leduc; #7213 50th St. Olds; #7215 Macwell Fort Sask; #7216 Sherridon Fort Sask; #7217 50th St. Athabasca; #7218 Main St. Slave Lake; #7220 Jasper Ave Edmonton; #7221 50th St. Sylvan Lake; #7222 20th Ave. Blairmore; #7223 50th St. Ponoka; #7224 52 St. Lacombe; #7225 Banff Ave. Banff; #7226 50th St. Beaumont; #7227 Queen St. Spruce Grove; #7228 Harvest Hills Calgary; #7229 Ellerslie/111th Edmonton; #7230 Heritage Edmonton; #7231 Hwy 567 & Main, Airdrie Rexall; #7232 Ellerslie & Parsons; #7233 Baseline & Bremner Dr, Sherwood Park; #7234 Wye & Ash, Sherwood Park; #7238 Manning & Miller, Edmonton Rexall; #7239 Patricia St. Jasper;	Alberta Netcare

Custodians	PIA Title
Katz Group Canada Ltd./Rexall, Continued...	Alberta Netcare
#7240 5th Ave. High River; #7241 50th St. Stony Plain; #7243 Springborough Professional Centre, Calgary; #7244 Chippewa Rd, Sherwood Park; #7251 50th / 102nd Edmonton; #7252 Great West Drugs, Edmonton; #7253 Southgate SC Edmonton; #7255 Pleasantview SC Edmonton; #7257 Crescent Edmonton; #7258 Calgary Managed Care LTC; #7259 Health Plus Calgary; #7260 ATB Calgary; #7261 Dickensfield Edmonton; #7262 Red Mile Calgary; #7265 Jasper Ave. & 108th St. Rexall, Edmonton; #7266 Main & Morden Rexall, Pincher Crk; #7267 Main St. Fort Mcleod; #7268 1st St. Cochrane; #7269 8th St. Canmore; #7271 Ross St. Red Deer; #7272 48 Ave. Red Deer; #7273 Medicine Hat – Zanes; #7274 Medicine Hat – Southview; #7275 City Centre Calgary; #7276 Clareview Edmonton; #7277 Rexall On Call, Calgary; #7278 Rexall Myros, Edmonton; #7282 Canyon Meadows Calgary; #7283 Douglasdale Calgary; #7284 Mayland Hghts Calgary; #7285 McKenzieTown Calgary; #7286 Village Ave, Okotoks; #7287 Strathcona Calgary; #7288 Transcanada Calgary; #7289 Tuscany Blvd Calgary; #7292 McKnight/ Falconbridge Calgary; #7294 163 St. & 96 Ave. Rexall; #9801 Outpatient Rx; #9802 Outpatient Rx Royal Alex	
Sobeys Inc. Pharmacy – #1104 Uplands (F), Lethbridge; #1110 Tuscany Boulevard, CALG; #1117 Bridlewood, CALG; #1127 Canmore, Canmore; #1129 Royal Oak, CALG; #1130 Okotoks(F), Okotoks; #1139 Country Hills (F), CALG; #1145 Millrise, CALG; #1713 Forest Lawn, CALG; #3101 St. Albert, St. Albert; #3105 Gaetz South (F), Red Deer; #3111 Rosslyn (F), EDM; #3116 Station Square, Ft Sask; #3127 Hawkstone, EDM; #3132 Beaumaris, EDM; #3142 Terwillgar, EDM; #3143 Millwoods, EDM; #3144 Leduc (F), Leduc; #3153 Nottingham (F), Sherwood PK; #5020 Cranston, CALG; #5169 Southbrook, EDM	Alberta Netcare
Callingwood Pharmacy	Alberta Netcare
Wal-Mart Canada Corp., Pharmacies; #1034 Stettler #1062 Wainwright; #1084 Olds; #1102 Sylvan Lake; #3075 Red Deer Centre Red Deer; #3112 Wetaskiwin; #3181 Camrose; #3194 20 & 50 Ave. Red Deer; #3657 Leduc; #1028 Drumheller; #1050 Airdrie; #1078 Lethbridge; #1089 Deerfoot Meadows; #1097 Sage Hills Calgary; #3009 Westbrook Mall CALG; #3013 11 & 57 Ave. NE CALG; #3048 Lethbridge; #5708 Okotoks; #1046 Taber; #1049 Strathmore; #3010 MacLeod CALG; #3011 Northland Village CALG; #3012 Marlborough Mall CALG; #3150 Medicine Hat; #3151 Shawville BLVD CALG; #3650 47 & 130 AVE CALG; #3658 Brooks; #5726 Country Hills BLVD CALG; #1068 Peace River; #1071 Vegreville; #1097 Currents DR EDM; #3027 Stony Plain RD W EDM; #3029 Parsons RD NW EDM; #3154 Wye RD Sherwood Park; #3157 Fort McMurray; #3168 Lloydminster; #3640 Cold Lake; #5743 Fort Saskatchewan; #1008 Drayton Valley; #1009 Whitecourt; #1030 Slave Lake; #1048 Edson; #3026 Capilano Mall EDM; #3028 137 & 40 ST. EDM; #3038 Hinton; #3087 St. Albert	Alberta Netcare
Nottingham Rxcellence Pharmacy	Alberta Netcare
South Side Pharmacy	Alberta Netcare
Eastwood IDA Pharmacy	Alberta Netcare
Bioscript Pharmacy	Alberta Netcare
Northside Dispensary	Alberta Netcare
Pharmasave #326	Alberta Netcare
Pharmasave #345 – Brooks Eco Pharmacy Ltd.	Alberta Netcare
Marshall's Prescription Center	Alberta Netcare
Acadia-Fairview Pharmacy	Alberta Netcare
Airport Pharmacy @ YYC	Alberta Netcare
McKnight Pharmacy	Alberta Netcare
Medicine Shoppe Pharmacy #311	Alberta Netcare
St. Paul Value Drug Mart	Alberta Netcare
Grand Ave. Pharmacy	Alberta Netcare
Avenida Pharmacy	Alberta Netcare
Synergy Pharmacy	Alberta Netcare
Vilna Pharmacy	Alberta Netcare
Preferred Pharmacy	Alberta Netcare
Wyckham Pharmacy	Alberta Netcare
Koegler's Pharmasave	Alberta Netcare
Healthgate Pharmacy	Alberta Netcare
Life Med Pharmacy	Alberta Netcare
Pharmacare Fulfillment Center	Alberta Netcare
Peter's Pharmacy	Alberta Netcare
Shamrock Pharmacy West	Alberta Netcare
Dalbrent Pharmacy	Alberta Netcare
Whitehorn Pharmacy	Alberta Netcare
Pharmasave 317 Jasper	Alberta Netcare
Care Plus #1 Pharmacy	Alberta Netcare
Pineridge Pharmacy	Alberta Netcare
20/20 Pharmacy	Alberta Netcare

Custodians	PIA Title
Dispensaries Limited – Sioux Road	Alberta Netcare
Mainstreet Home Health Pharmacy	Alberta Netcare
Calgary Rxellence	Alberta Netcare
Prairie Pharmacy	Alberta Netcare
The Medicine Shoppe #249	Alberta Netcare
Athabasca Value Drug Mart	Alberta Netcare
Medcare Pharmacy Ltd.	Alberta Netcare
Tri City Value Drug Mart	Alberta Netcare
Long's Value Drug Mart	Alberta Netcare
Family Pharmacy on 46 St.	Alberta Netcare

Provincial Health Boards

Health Quality Council of Alberta	PIA Addendum: Patient Experience Surveys
	HQCA's Primary Care Measurement Initiative
	Quality Reporting Inititaitve, Collection and Data Matching

Non-Custodians

"Affiliates and Information Managers (Electronic Medical Record Vendors/Physician Office System Program (POSP), Consultants)"

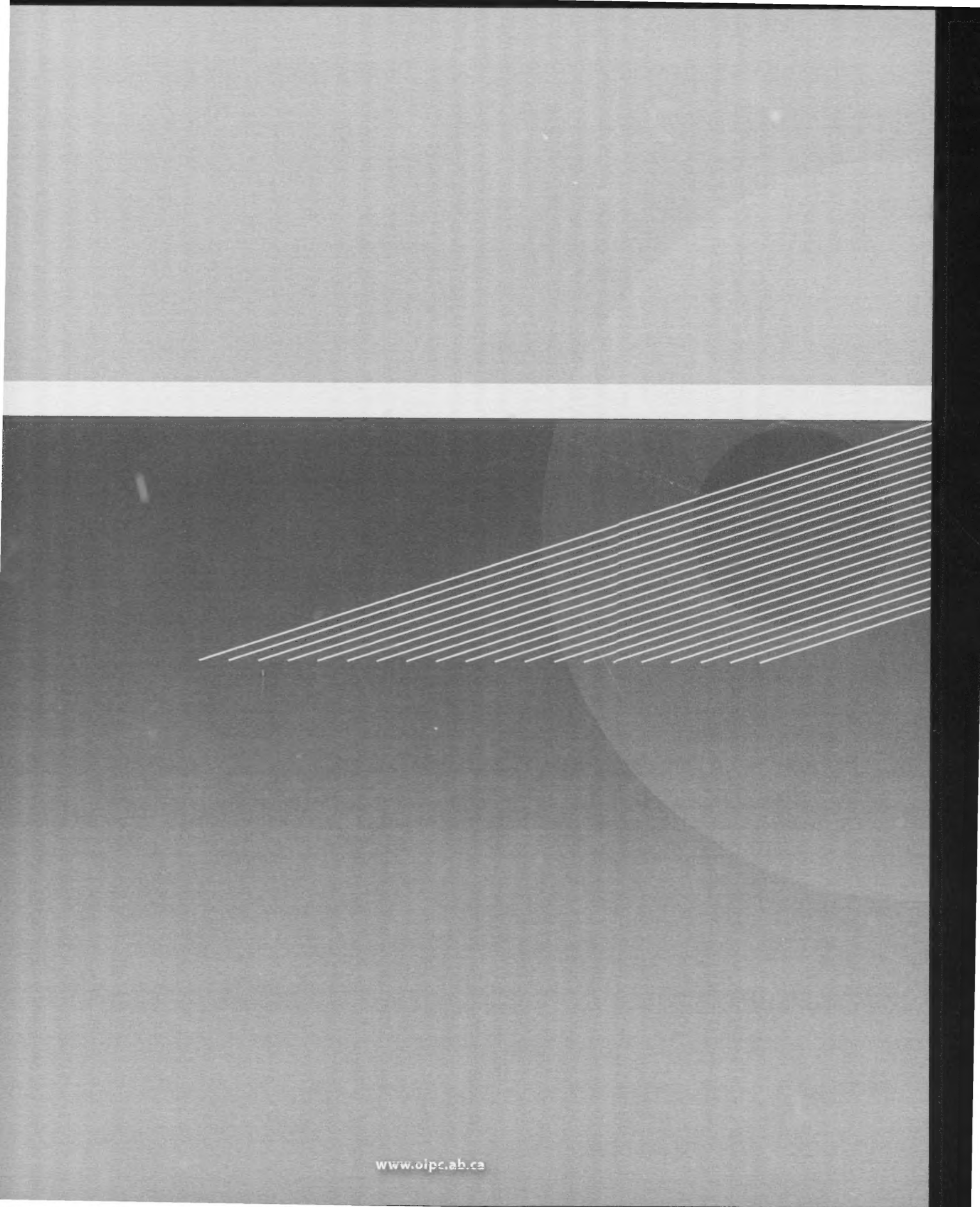
MD Physician Services Inc.	Practice Solutions Suite (PS Suite)
Physician Office System Program	Data Migration PIA Amendment
	POSP Data Migration PIA Addendum
	POSP Amendment Organization Management and QSP EMR Vendor, ASP Hosted EMR Implementation & Alberta Netcare Portal 2006
WOLF Medical Systems	Data Migration to Wolf Medical ASP
MD Physician Services Inc.	Data Migration to Practice Solutions ASP
Med Access	Data Migration to Med Access ASP
Telin Systems Ltd.	Telin Mediplan Export Project – Addendum to Physician Office System Program Data Migration

*Primary Care Networks (PCN)

Athabasca Primary Care Network	Athabasca PCN
Bow Valley Primary Care Network	Participation in CFPCN Unattached Patient Web Registry
Calgary Foothills Primary Care Network	Expansion of CFPCN Unattached Patient Web Registry
	CFPCN Riley Park Family Medical Clinic
	Unattached Patient Web Registry
Calgary Mosaic Primary Care Network	Participation in CFPCN Unattached Patient Web Registry
	Mosaic PCN Women's Health Clinic
Calgary Rural Primary Care Network	Participation in CFPCN Unattached Patient Web Registry
Calgary West Central Primary Care Network	Participation in Calgary Foothills Primary Care Network (CFPCN) Unattached Patient Web Registry
Cold Lake Primary Care Network	Cold Lake Primary Care Network
Edmonton North Primary Care Network	PIA Amendment and PCN Centralized Clinic Implementation and Netcare Portal 2006
Grande Prairie Primary Care Network	Grande Prairie Primary Care Network
Heartland Primary Care Network	Centralized Clinic Alberta Heartland PCN
Lloydminster Primary Care Network	Lloydminster Primary Care Network PIA
South Calgary Primary Care Network	Participation in CFPCN Unattached Patient Web Registry

* Primary Care Networks are formed on the basis of an agreement between custodians: a group of physicians located within a given geographic area, Alberta Health Services, and Alberta Health and Wellness. However, the resulting Primary Care Network organizations are not custodians.

For additional information regarding the above listed PIAs, please refer to the OIPC webpage at **www.oipc.ab.ca**.



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